

# **EXHIBIT 7**

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

RICHARD ROSARIO,

Plaintiff,

-against-

THE CITY OF NEW YORK, *et al.*,

Defendants.

18-cv-4023 (LGS)

**DECLARATION OF RICK SAWYER**

I, Rick Sawyer, an attorney admitted to practice in the State of New York and the Southern District of New York, submit this declaration under penalty of perjury:

1. From October 2016 until February 2021, I worked as an associate at Neufeld Scheck & Brustin, LLP, with offices at 99 Hudson Street, 8th Floor, New York, New York 10013.
2. I make this declaration in support of an application for attorney's fees under 42 U.S.C. § 1988, for hours I worked on this matter. This declaration is based on my personal knowledge.

**EDUCATION AND EXPERIENCE**

3. I graduated from New York University School of Law in 2013, where I was recognized as an Arthur Garfield Hays Civil Liberties Fellow and served as an executive editor of the *Journal of Legislation and Public Policy*. Before joining NSB, I clerked for the Honorable Jenny Rivera of the New York State Court of Appeals; worked as a Staff Attorney at the U.S. Court of Appeals for the Second Circuit; and clerked for the Honorable Sarah Netburn of the Southern District of New York. My resume is attached as Exhibit A.
4. At NSB, I worked almost exclusively on 42 U.S.C. § 1983 civil rights litigation in federal courts around the country. My practice focused on wrongful conviction cases, such as Richard Rosario's, involving lawsuits against police, prosecutors, and other state actors

for unconstitutional misconduct. I mastered a body of law at the intersection of criminal procedure and civil rights that is relatively new and constantly evolving. To my knowledge, NSB is the only firm in the nation with a practice fully dedicated to litigating such cases.

5. Wrongful conviction cases require navigating difficult procedural defenses, including qualified immunity, and a nuanced understanding of liability under § 1983. They often raise the same due process claims, including fabrication of evidence, suppression of evidence, and malicious prosecution, that were at issue here. Factually, these cases involve flawed or fraudulent inculpatory evidence like the misidentifications caused by suggestive identification procedures in this case. My familiarity with these issues, and access to NSB's collective knowledge derived from 20 years of litigating these cases, made my work on this case much more efficient than it otherwise would have been.
6. On behalf of Plaintiff, I request compensation for my work at a rate of \$450 an hour. This requested rate is reasonable in light of the relevant market and my experience and skill.

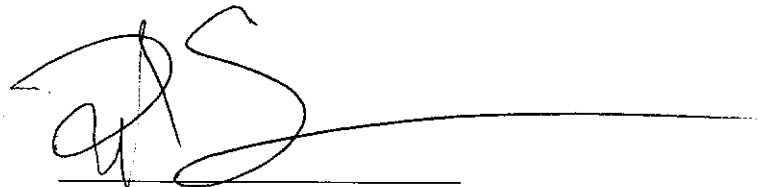
#### **WORK IN THIS CASE**

7. I am seeking compensation, on behalf of Plaintiff, for hours I worked on this matter from October 2016 to January 2021.
8. Under the guidance of my senior colleagues, Nick Brustin, Emma Freudenberger, and Anna Benvenuti Hoffmann, I drafted the complaint; worked on the 440 appeal; drafted discovery requests; drafted and coordinated discovery responses, including reviewing documents for production; conducted legal research and drafted the opposition to motion to dismiss; prepared for and participated in depositions, including meeting and coordinating with witnesses; worked with experts, including editing their expert reports; managed a junior attorney, paralegal, and interns on work on the case; worked with investigators; drafted the opposition to summary judgment and the 56.1 statements in support of the summary judgment briefing; and drafted Plaintiff's pre-motion *Daubert* letter.

9. As set forth in the billing records attached as Exhibit B, which come from contemporaneously kept timekeeping logs, I seek compensation for a total of 1266.5 attorney hours.
10. I have reviewed the attached billing record in its entirety and made an effort to take a conservative and reasonable approach to the total hours for which I seek compensation. In my judgment, each hour set forth in Exhibit B was required by the circumstances and reasonably expended in pursuit of the favorable outcome in this complicated and important civil rights case.
11. I hereby declare under penalty of perjury that the foregoing is true.

Date: September 20, 2022

New York, NY



Rick Sawyer

# **EXHIBIT A**

## **RICK SAWYER**

### **EDUCATION**

#### **NYU SCHOOL OF LAW**

Juris Doctor, *cum laude*, May 2013

Honors: Arthur Garfield Hays Civil Liberties Fellow  
Executive Editor, *Journal of Legislation and Public Policy*

#### **RICE UNIVERSITY**

Bachelor of Arts, History, *cum laude*, May 2000

### **LEGAL EXPERIENCE**

#### **OFFICE OF THE ATTORNEY GENERAL, New York, NY**

*Special Counsel for Hate Crimes*, February 2021–present

Supervise the Hate Crimes Unit in the Civil Rights Bureau. Oversee OAG's civil hate crimes docket. Develop new investigations and manage litigation in state and federal court. Represent the OAG in press briefings and public meetings. Connect with local community groups and other stakeholders. Oversee multi-state AGs' working group on hate crimes and civil rights.

#### **NEUFELD SCHECK & BRUSTIN, LLP, New York, NY**

*Associate*, October 2016–February 2021

Conducted police misconduct litigation in state and federal courts across the country. Supervised junior attorneys, interns, and paralegals. Took and defended depositions. Researched and drafted motions, motion responses, appellate briefs, pleadings, and court correspondence. Argued motions in court. Managed investigators and experts. Representative cases included lawsuits for damages caused by wrongful conviction and wrongful death while incarcerated.

#### **U.S. DISTRICT COURT, SOUTHERN DISTRICT OF NEW YORK, New York, NY**

*Law Clerk for Judge Sarah Netburn*, August 2015–October 2016

Drafted orders and opinions resolving dispositive motions and discovery disputes. Representative matters included immigration, ERISA, discrimination, habeas corpus, and contract cases. Assisted federal judge conducting a jury trial. Supervised interns.

#### **U.S. COURT OF APPEALS, SECOND CIRCUIT, STAFF ATTORNEY'S OFFICE, New York, NY**

*Staff Attorney*, August 2014–August 2015

Recommended dispositions of pro se appeals and motions to federal appellate court. Representative matters included prisoners' rights, police misconduct, discrimination, habeas corpus, and complex commercial appeals.

#### **NEW YORK STATE COURT OF APPEALS, New York, NY**

*Law Clerk for Judge Jenny Rivera*, August 2013–August 2014

Drafted bench memoranda and opinions for judge of New York's highest court. Representative matters included criminal appeals, municipal home rule cases, challenges to state agency action, contract cases, and civil confinement cases.

#### **ACLU, IMMIGRANTS' RIGHTS PROJECT, New York, NY**

*Intern*, January 2013–May 2013

Worked on cases challenging immigration detention, including extensive factual and legal research. Assisted staff attorneys preparing for oral arguments in both trial and appellate courts.

#### **CHILDREN'S RIGHTS, New York, NY**

*Intern*, August 2012–December 2012

Assisted a class action against Rhode Island's foster care system. Reviewed and digested thousands of documents for summary judgment. Researched and drafted sections of discovery motions concerning privilege waiver.

**URBAN JUSTICE CENTER, MENTAL HEALTH PROJECT, New York, NY**

*Intern*, 2012–August 2012

Initiated a rulemaking procedure to curtail solitary confinement on Rikers Island. Interviewed incarcerated clients as part of a class action settlement concerning reentry for pretrial detainees with mental disabilities. Provided direct legal services to indigent clients, handling housing, discharge planning, public benefits, and Social Security cases. Wrote and defended FOIL requests.

**NYCLU, New York, NY**

*Clinic Intern*, January 2012–May 2012

Sued Nassau County to establish a jails oversight board. Researched Fourth Amendment and New York constitutional law for an appeal challenging the warrantless GPS search of a state employee.

**LEGAL AID SOCIETY, PRISONERS' RIGHTS PROJECT, New York, NY**

*Intern*, March 2011–January 2012

Interviewed dozens of incarcerated clients in preparation for a class action against New York City's jails. Topics of discussion included jail brutality, staff misconduct, medical indifference, and suicide prevention. Researched and wrote a comprehensive memorandum on legal issues related to multi-facility class action.

**OTHER EXPERIENCE**

**IAC/MINDSPARK, Boston, MA**

*Content Manager*, 2008–2010

Edited articles for a how-to website. Managed a team of writers to produce between 20 and 30 articles a week.

**BOSTONIST.COM, Boston, MA**

*Co-Editor-in-Chief*, 2008–2010

Oversaw a team of freelance writers and photographers. Led the site's coverage of visual arts and crime.

**DUKE UNIVERSITY, PRATT SCHOOL OF ENGINEERING, Durham, NC**

*Program Coordinator*, 2005–2007

Served as lead administrator for a multi-million-dollar bioengineering research institute. Assisted with grant writing and reporting. Oversaw grant expenditures. Planned and executed an international research conference.

**MARSHALL & TAYLOR, P.C., Raleigh, NC**

*Paralegal*, 2002–2005

At a small family and real estate practice, examined residential real estate titles, disbursed mortgage loans, and conducted investigations.

**PUBLICATIONS AND PRESENTATIONS**

- *Joseph M. McLaughlin*, JUDGES OF THE SECOND CIRCUIT (2016)
- *Henry J. Friendly*, JUDGES OF THE SECOND CIRCUIT (2016)
- *John Marshall Harlan*, JUDGES OF THE SECOND CIRCUIT (2016)
- *Henry Wade Rogers*, JUDGES OF THE SECOND CIRCUIT (2016)
- *Prisoner Free Exercise Claims: RFRA, RLUIPA, and the First Amendment* (2015) (CLE for Second Circuit Staff Attorney's Office)

**ADMISSIONS**

New York; U.S. Supreme Court; Second, Fifth, and Ninth Circuits; Southern and Eastern Districts of New York.

# **EXHIBIT B**



## SUBSTANTIVE HOURS

Date	Person	Client	Activity	Description	Duration	Time Totals
12-Oct-16	Richard Sawyer	Rosario (Richard)	Meeting	Case status meeting w/ EF & AL	0:24	0.4
3-Nov-16	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ client, NB, EF, investigator	0:30	0.5
8-Nov-16	Richard Sawyer	Rosario (Richard)	Research	Research court of cls. opinion	0:12	0.2
15-Nov-16	Richard Sawyer	Rosario (Richard)	Meeting	Meeting w/ RR, EF, NB, CL, MF	0:48	0.8
15-Nov-16	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ NB, EF, CL, RR	0:06	0.1
17-Nov-16	Richard Sawyer	Rosario (Richard)	Research	Research for 440 appeal.	0:18	0.3
17-Nov-16	Richard Sawyer	Rosario (Richard)	Research	Research appeal of 440	0:10	0.2
17-Nov-16	Richard Sawyer	Rosario (Richard)	Research	Pre-filing research	0:24	0.4
17-Nov-16	Richard Sawyer	Rosario (Richard)	Research	Research 440 appeal	0:24	0.4
17-Nov-16	Richard Sawyer	Rosario (Richard)	Research	Research 440 appeal	0:18	0.3
17-Nov-16	Richard Sawyer	Rosario (Richard)	Research	Research 440 appeal	0:12	0.2
17-Nov-16	Richard Sawyer	Rosario (Richard)	Research	Research 440 appeal	0:48	0.8
18-Nov-16	Richard Sawyer	Rosario (Richard)	Research	Pre-filing research.	0:48	0.8
				Pre-filing research		
22-Nov-16	Richard Sawyer	Rosario (Richard)	Research		0:37	0.6
				Pre-filing research		
22-Nov-16	Richard Sawyer	Rosario (Richard)	Research		0:36	0.6
23-Nov-16	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ NB, EF, MF re appeal/doc collection	0:18	0.3
25-Nov-16	Richard Sawyer	Rosario (Richard)	Research	Research 440 appeal	1:18	1.3
28-Nov-16	Richard Sawyer	Rosario (Richard)	Draft	Draft 440 appeal motion	3:48	3.8
29-Nov-16	Richard Sawyer	Rosario (Richard)	Draft	Draft 440 appeal	6:48	6.8
30-Nov-16	Richard Sawyer	Rosario (Richard)	Draft	Draft 440 appeal	1:24	1.4
1-Dec-16	Richard Sawyer	Rosario (Richard)	Correspondence	Email to client re: 440 appeal	0:06	0.1
1-Dec-16	Richard Sawyer	Rosario (Richard)	Prep	Prepare 440 appeal for filing.	0:12	0.2
2-Dec-16	Richard Sawyer	Rosario (Richard)	Draft	Draft 440 appeal	0:20	0.3
5-Dec-16	Richard Sawyer	Rosario (Richard)	Draft	Prepare 440 appeal	0:18	0.3
5-Dec-16	Richard Sawyer	Rosario (Richard)	Draft	Talk to client/draft 440 appeal .	0:50	0.8
6-Dec-16	Richard Sawyer	Rosario (Richard)	Research	Pre-filing research	1:18	1.3
6-Dec-16	Richard Sawyer	Rosario (Richard)	Correspondence	Email client.	0:08	0.1
				Review trial transcripts/other source docs. in prep. for client meeting.		
7-Dec-16	Richard Sawyer	Rosario (Richard)	Review		8:12	8.2
8-Dec-16	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ client.	4:00	4.0
8-Dec-16	Richard Sawyer	Rosario (Richard)	Review	Review documents.	2:00	2.0

15-Dec-16	Richard Sawyer	Rosario (Richard)	Correspondence	Email to client	0:12	0.2
22-Dec-16	Richard Sawyer	Rosario (Richard)	Phone Call	Call w/ EF, NB, RR, and CL	0:36	0.6
29-Dec-16	Richard Sawyer	Rosario (Richard)	Draft	Draft NOCs	0:30	0.5
10-Jan-17	Richard Sawyer	Rosario (Richard)	Review	Review Bronx DA's response to motion	1:00	1.0
11-Jan-17	Richard Sawyer	Rosario (Richard)	Review	Review Bronx DA's oppo to motion for leave to appeal	1:18	1.3
12-Jan-17	Richard Sawyer	Rosario (Richard)	Research	Background research	0:42	0.7
12-Jan-17	Richard Sawyer	Rosario (Richard)	Review	review RR's video appearance on Facebook	1:30	1.5
12-Jan-17	Richard Sawyer	Rosario (Richard)	Draft	Draft NOCs	3:06	3.1
13-Jan-17	Richard Sawyer	Rosario (Richard)	Research	Research basis for withdrawing guilty plea.	0:42	0.7
13-Jan-17	Richard Sawyer	Rosario (Richard)	Research	research reply to motion for leave to appeal	1:12	1.2
13-Jan-17	Richard Sawyer	Rosario (Richard)	Draft	Revise NOCs and send to EF	0:12	0.2
13-Jan-17	Richard Sawyer	Rosario (Richard)	Draft	Finalize NOCs for submission to client	0:42	0.7
17-Jan-17	Richard Sawyer	Rosario (Richard)	phone call	Phone call w/ client	0:30	0.5
17-Jan-17	Richard Sawyer	Rosario (Richard)	Draft	Finalize NOCs	0:12	0.2
18-Jan-17	Richard Sawyer	Rosario (Richard)	Draft	Draft reply to motion for leave to appeal	3:18	3.3
18-Jan-17	Richard Sawyer	Rosario (Richard)	Draft	Revise reply to motion for leave to appeal	0:12	0.2
18-Jan-17	Richard Sawyer	Rosario (Richard)	Correspondence	Email to client and co-counsel	0:06	0.1
19-Jan-17	Richard Sawyer	Rosario (Richard)	Draft	Revise reply re: motion for leave	1:06	1.1
19-Jan-17	Richard Sawyer	Rosario (Richard)	Phone Call	Call w/ client	0:18	0.3
19-Jan-17	Richard Sawyer	Rosario (Richard)	Draft	Finalize reply brief and prepare for filing.	0:30	0.5
24-Jan-17	Richard Sawyer	Rosario (Richard)	Prep	Prepare Notices of Claim for filing	0:06	0.1
24-Jan-17	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ EF, AL, MF re: case strategy.	0:12	0.2
24-Jan-17	Richard Sawyer	Rosario (Richard)	phone call	Call/email Donna Lee Jones re: Richard's loan	0:12	0.2
27-Jan-17	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ EF, PH re: Richard's case	0:24	0.4
27-Jan-17	Richard Sawyer	Rosario (Richard)	Correspondence	Email Mary re: assembling packets for Patrick	0:18	0.3
27-Jan-17	Richard Sawyer	Rosario (Richard)	Research	Research requirements of notice of claim	0:18	0.3
30-Jan-17	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call to city re: NOC	0:12	0.2
31-Jan-17	Richard Sawyer	Rosario (Richard)	phone call	Phone call w/ EF and Richard	0:12	0.2
31-Jan-17	Richard Sawyer	Rosario (Richard)	Other	Review Richard's podcast	0:18	0.3
31-Jan-17	Richard Sawyer	Rosario (Richard)	Draft	Draft co-counsel agreement	0:36	0.6
3-Feb-17	Richard Sawyer	Rosario (Richard)	phone call	Call Richard re: appointment w/ expert, scheduling	0:12	0.2
7-Feb-17	Richard Sawyer	Rosario (Richard)	Review	Review record to prepare to begin drafting complaint	2:12	2.2
8-Feb-17	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ NB, EF, investigator PH re: case investigation	0:48	0.8
8-Feb-17	Richard Sawyer	Rosario (Richard)	Research	Legal, factual research to begin drafting complaint	2:20	2.3

9-Feb-17	Richard Sawyer	Rosario (Richard)	Research	Factual and legal research for preparing complaint, draft complaint	5:18	5.3
10-Feb-17	Richard Sawyer	Rosario (Richard)	Prep	Prep for client interview & interview client	1:48	1.8
10-Feb-17	Richard Sawyer	Rosario (Richard)	Draft	Draft complaint	2:24	2.4
13-Feb-17	Richard Sawyer	Rosario (Richard)	Draft	draft complaint	6:48	6.8
14-Feb-17	Richard Sawyer	Rosario (Richard)	Draft	Draft complaint	3:42	3.7
15-Feb-17	Richard Sawyer	Rosario (Richard)	Draft	Revise complaint	1:36	1.6
24-Feb-17	Richard Sawyer	Rosario (Richard)	phone call	Call to client	0:12	0.2
24-Feb-17	Richard Sawyer	Rosario (Richard)	Correspondence	Request adjournment of 50-h hearing.	0:18	0.3
3-Mar-17	Richard Sawyer	Rosario (Richard)	Draft	Draft co-counsel rider	0:36	0.6
6-Mar-17	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ NB, EF re: preparing pleadings	0:12	0.2
15-Mar-17	Richard Sawyer	Rosario (Richard)	Phone Call	Call w/ client	0:12	0.2
15-Mar-17	Richard Sawyer	Rosario (Richard)	Digest	Digest Richard's trial testimony	3:36	3.6
16-Mar-17	Richard Sawyer	Rosario (Richard)	phone call	Phone call w/ EF and co-counsel re: Richard's criminal case	0:24	0.4
16-Mar-17	Richard Sawyer	Rosario (Richard)	Research	Legal research on criminal case and jail assault, discussion w/ EF, email to co-counsel	0:30	0.5
28-Mar-17	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ EF, MF re: Richard's 50-h. Call	0:36	0.6
29-Mar-17	Richard Sawyer	Rosario (Richard)	Prep	50(h) prep	3:54	3.9
30-Mar-17	Richard Sawyer	Rosario (Richard)	Prep	Prep for 50(h) hearing	3:30	3.5
31-Mar-17	Richard Sawyer	Rosario (Richard)	Prep	50(h) prep	1:18	1.3
3-Apr-17	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ client & EF	0:24	0.4
10-Apr-17	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ client, EF, Chip	3:00	3.0
3-May-17	Richard Sawyer	Rosario (Richard)	phone call	Phone call w/ Richard	0:12	0.2
4-May-17	Richard Sawyer	Rosario (Richard)	Draft	Revise complaint	3:24	3.4
5-May-17	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ PH re: witness research	0:12	0.2
5-May-17	Richard Sawyer	Rosario (Richard)	Draft	Revise complaint.	1:36	1.6
8-May-17	Richard Sawyer	Rosario (Richard)	Draft	Revise complaint	1:06	1.1
11-May-17	Richard Sawyer	Rosario (Richard)	Prep	Prepare material for RR's 50-h prep session	0:24	0.4
11-May-17	Richard Sawyer	Rosario (Richard)	Prep	Deposition prep w/ RR, NB, EF	2:36	2.6
12-May-17	Richard Sawyer	Rosario (Richard)	Research	Legal research for 50-h prep.	0:48	0.8
15-May-17	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ client.	0:18	0.3
16-May-17	Richard Sawyer	Rosario (Richard)	Prep	50-h prep	2:24	2.4
24-May-17	Richard Sawyer	Rosario (Richard)	Prep	50-h prep	1:36	1.6
25-May-17	Richard Sawyer	Rosario (Richard)	Prep	50-h prep w/ EF and client	4:00	4.0
26-May-17	Richard Sawyer	Rosario (Richard)	Prep	50-h prep	1:30	1.5

30-May-17	Richard Sawyer	Rosario (Richard)	Deposition	Prep for 50-h hearing, attend 50-h hearing.	8:48	8.8
1-Jun-17	Richard Sawyer	Rosario (Richard)	Meeting	Investigation meeting w/ EF, NB, PH, co-counsel	2:00	2.0
13-Jun-17	Richard Sawyer	Rosario (Richard)	phone call	Phone call w/ EF, client re: case strategy	0:12	0.2
19-Jun-17	Richard Sawyer	Rosario (Richard)	Phone Call	Call to client.	0:12	0.2
20-Jun-17	Richard Sawyer	Rosario (Richard)	Phone Call	Call w/ client.	0:18	0.3
30-Jun-17	Richard Sawyer	Rosario (Richard)	Correspondence	Draft letter to comptroller's office	0:18	0.3
12-Jul-17	Richard Sawyer	Rosario (Richard)	Miscellaneous	Reviewed production to Comptroller for privilege.	0:42	0.7
14-Jul-17	Richard Sawyer	Rosario (Richard)	Review	Prep docs for mailing to comptroller, finish privilege review, draft letter to comptroller.	1:06	1.1
29-Dec-17	Richard Sawyer	Rosario (Richard)	Draft	Revise complaint.	3:06	3.1
2-Jan-18	Richard Sawyer	Rosario (Richard)	Draft	Revise complaint	4:12	4.2
3-Jan-18	Richard Sawyer	Rosario (Richard)	Draft	Revise federal complaint.	5:12	5.2
9-Jan-18	Richard Sawyer	Rosario (Richard)	Draft	Revise federal complaint.	4:24	4.4
11-Jan-18	Richard Sawyer	Rosario (Richard)	Draft	Revise federal complaint	2:30	2.5
23-Jan-18	Richard Sawyer	Rosario (Richard)	Draft	Revise Rosario complaint.	1:18	1.3
25-Jan-18	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ client re: complaint & case strategy.	0:18	0.3
25-Jan-18	Richard Sawyer	Rosario (Richard)	Draft	Research/revise complaint	1:36	1.6
29-Jan-18	Richard Sawyer	Rosario (Richard)	Research	Research law, prepare civil rights complaint for filing.	6:00	6.0
20-Feb-18	Richard Sawyer	Rosario (Richard)	Review	Document review	0:18	0.3
21-Feb-18	Richard Sawyer	Rosario (Richard)	Phone Call	Call w/ client re: case strategy.	0:12	0.2
23-Feb-18	Richard Sawyer	Rosario (Richard)	Review	Review audio-visual docs	1:00	1.0
19-Mar-18	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ client.	0:12	0.2
20-Mar-18	Richard Sawyer	Rosario (Richard)	Correspondence	Correspondence w/ RR and cocounsel.	0:18	0.3
4-Apr-18	Richard Sawyer	Rosario (Richard)	Research	Legal research.	0:24	0.4
4-Apr-18	Richard Sawyer	Rosario (Richard)	Research	Legal research re: service.	0:54	0.9
16-Apr-18	Richard Sawyer	Rosario (Richard)	Other	Research and document review	0:24	0.4
16-Apr-18	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ partners re: case	0:18	0.3
17-Apr-18	Richard Sawyer	Rosario (Richard)	Review	Research and document review	0:42	0.7
24-Apr-18	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ opposing counsel, talk w/ EF	0:12	0.2
26-Apr-18	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ opposing counsel (2 calls)	0:12	0.2
26-Apr-18	Richard Sawyer	Rosario (Richard)	Research	Case research	0:30	0.5
26-Apr-18	Richard Sawyer	Rosario (Richard)	Correspondence	Draft letter to client.	0:18	0.3
27-Apr-18	Richard Sawyer	Rosario (Richard)	Draft	Revise letter to client, email NB.	0:12	0.2
4-May-18	Richard Sawyer	Rosario (Richard)	Review	Review notice of removal.	0:18	0.3
7-May-18	Richard Sawyer	Rosario (Richard)	Research	Case research	0:42	0.7

10-May-18	Richard Sawyer	Rosario (Richard)	Phone Call	Call to opposing counsel.	0:06	0.1
11-May-18	Richard Sawyer	Rosario (Richard)	Correspondence	Email to client re: releases.	0:06	0.1
11-May-18	Richard Sawyer	Rosario (Richard)	Research	Legal research re: removal.	0:18	0.3
11-May-18	Richard Sawyer	Rosario (Richard)	Research	Research deadline to serve after removal.	0:48	0.8
11-May-18	Richard Sawyer	Rosario (Richard)	Research	Research service deadlines.	0:18	0.3
12-May-18	Richard Sawyer	Rosario (Richard)	Draft	Draft motion for service deadline.	1:36	1.6
13-May-18	Richard Sawyer	Rosario (Richard)	Draft	Revise motion re: service deadline.	0:18	0.3
14-May-18	Richard Sawyer	Rosario (Richard)	Draft	Revise letter motion for service deadline.	1:12	1.2
5-Jun-18	Richard Sawyer	Rosario (Richard)	Correspondence	Email to opposing counsel	0:12	0.2
5-Jun-18	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ EF re: case strategy w/r/t 1983 plan.	0:06	0.1
8-Jun-18	Richard Sawyer	Rosario (Richard)	Draft	Draft letter motion to withdraw from 1983 plan.	1:00	1.0
15-Jun-18	Richard Sawyer	Rosario (Richard)	Draft	Revise motion to take case out of plan.	0:18	0.3
27-Jun-18	Richard Sawyer	Rosario (Richard)	Correspondence	Review court order and email opposing counsel.	0:18	0.3
27-Jun-18	Richard Sawyer	Rosario (Richard)	Correspondence	Read email from opposing counsel, email NB & EF re: response strategy.	0:12	0.2
28-Jun-18	Richard Sawyer	Rosario (Richard)	Correspondence	Read and respond to opposing counsel correspondence.	0:12	0.2
13-Jul-18	Richard Sawyer	Rosario (Richard)	Correspondence	Read/respond to client correspondence.	0:12	0.2
16-Jul-18	Richard Sawyer	Rosario (Richard)	Review	Listen to internet radio broadcast featuring client	0:48	0.8
24-Jul-18	Richard Sawyer	Rosario (Richard)	Correspondence	plan.	0:12	0.2
25-Jul-18	Richard Sawyer	Rosario (Richard)	Draft	Draft case management plan and joint letter to Court.	4:00	4.0
26-Jul-18	Richard Sawyer	Rosario (Richard)	Draft	Edits to joint letter/case management plan	0:48	0.8
26-Jul-18	Richard Sawyer	Rosario (Richard)	Phone Call	Rule 26(f) conference w/ opposing counsel.	0:18	0.3
26-Jul-18	Richard Sawyer	Rosario (Richard)	Review	Review docs re: possible motion to dismiss	0:48	0.8
27-Jul-18	Richard Sawyer	Rosario (Richard)	Correspondence	counsel	0:12	0.2
27-Jul-18	Richard Sawyer	Rosario (Richard)	Review	Review docs to re: amendment to complaint.	2:24	2.4
1-Aug-18	Richard Sawyer	Rosario (Richard)	Draft	Review and revise draft RFP	1:06	1.1
6-Aug-18	Richard Sawyer	Rosario (Richard)	Correspondence	Read report from investigator, email EF, NB	0:12	0.2
14-Aug-18	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ opposing counsel, review follow-up email.	0:12	0.2
21-Aug-18	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ EF re: discovery	0:18	0.3
21-Aug-18	Richard Sawyer	Rosario (Richard)	Correspondence	Email to potential expert.	0:06	0.1
21-Aug-18	Richard Sawyer	Rosario (Richard)	Prep	Prep for court hearing.	0:18	0.3
21-Aug-18	Richard Sawyer	Rosario (Richard)	Court appearance	Initial conference	0:24	0.4
21-Aug-18	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ EF and AF re: case tasks	0:12	0.2
21-Aug-18	Richard Sawyer	Rosario (Richard)	Review	Review documents following initial hearing.	0:18	0.3
21-Aug-18	Richard Sawyer	Rosario (Richard)	Draft	Draft discovery requests: RFPs, Rogs, RTA.	3:12	3.2



22-Aug-18	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ client re: case update, discovery	0:48	0.8
22-Aug-18	Richard Sawyer	Rosario (Richard)	Draft	Revise discovery demands, serve on Ds.	1:54	1.9
22-Aug-18	Richard Sawyer	Rosario (Richard)	Correspondence	Read and respond to email from opposing counsel.	0:12	0.2
23-Aug-18	Richard Sawyer	Rosario (Richard)	Review	Review Ds' RFPs, organize Nextpoint, instructions to Ali	0:24	0.4
4-Sep-18	Richard Sawyer	Rosario (Richard)	Review	Read/respond to email from opposing counsel	0:12	0.2
5-Sep-18	Richard Sawyer	Rosario (Richard)	Review	Review documents for RFP production	6:00	6.0
6-Sep-18	Richard Sawyer	Rosario (Richard)	Review	Review docs for RFP response.	5:36	5.6
6-Sep-18	Richard Sawyer	Rosario (Richard)	Review	Research on RFP/Rog responses	0:30	0.5
7-Sep-18	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ EF, NB, AF re: case strategy	0:18	0.3
7-Sep-18	Richard Sawyer	Rosario (Richard)	Draft	Read bifurcation motion and draft email to opposing counsel	0:42	0.7
7-Sep-18	Richard Sawyer	Rosario (Richard)	Review	Review D document demands and Rogs, notes on responsive docs and review AF work	0:54	0.9
7-Sep-18	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ co-counsel Dan McGuinness	0:18	0.3
7-Sep-18	Richard Sawyer	Rosario (Richard)	Review	Review documents for RFP response	2:36	2.6
10-Sep-18	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ client re: interrogatories.	3:06	3.1
12-Sep-18	Richard Sawyer	Rosario (Richard)	Review	Review docs for RFP response	5:12	5.2
13-Sep-18	Richard Sawyer	Rosario (Richard)	Correspondence	Email to Chip re: case	0:24	0.4
13-Sep-18	Richard Sawyer	Rosario (Richard)	Phone Call	phone call w/ Chip and EF re: case strategy	0:18	0.3
13-Sep-18	Richard Sawyer	Rosario (Richard)	Review	Document review for RFP production	4:24	4.4
14-Sep-18	Richard Sawyer	Rosario (Richard)	Correspondence	Email to opposing counsel.	0:06	0.1
14-Sep-18	Richard Sawyer	Rosario (Richard)	Correspondence	Email to client re: RFPs	0:06	0.1
14-Sep-18	Richard Sawyer	Rosario (Richard)	Research	Legal research re: proposed motion to dismiss.	0:36	0.6
17-Sep-18	Richard Sawyer	Rosario (Richard)	Draft	Draft email response to opposing counsel re: discovery	1:18	1.3
17-Sep-18	Richard Sawyer	Rosario (Richard)	Review	Review documents for RFP production	2:18	2.3
17-Sep-18	Richard Sawyer	Rosario (Richard)	Review	Review RFP responses	0:48	0.8
18-Sep-18	Richard Sawyer	Rosario (Richard)	Correspondence	Revise and send discovery email to opposing counsel	0:12	0.2
18-Sep-18	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ client re: discovery production	0:06	0.1
18-Sep-18	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ Bronx DA re: subpoena	0:06	0.1
18-Sep-18	Richard Sawyer	Rosario (Richard)	Correspondence	Review Defendants' RFP response (compared to police file) and respond to D counsel's email	0:24	0.4
18-Sep-18	Richard Sawyer	Rosario (Richard)	Review	Review Bronx DA letter and respond	0:18	0.3
18-Sep-18	Richard Sawyer	Rosario (Richard)	Review	Review documents for RFP production	1:00	1.0
18-Sep-18	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ Chip re: case	0:06	0.1
18-Sep-18	Richard Sawyer	Rosario (Richard)	Review	Review and revise RFP and Rog responses.	1:54	1.9
20-Sep-18	Richard Sawyer	Rosario (Richard)	Draft	Draft response email to opposing counsel re: discovery	0:18	0.3

20-Sep-18	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ EF and opposing counsel	0:06	0.1
21-Sep-18	Richard Sawyer	Rosario (Richard)	Review	Review document production	0:12	0.2
25-Sep-18	Richard Sawyer	Rosario (Richard)	Draft	Draft supplemental Rule 26 disclosures	0:30	0.5
26-Sep-18	Richard Sawyer	Rosario (Richard)	Review	Review Rog responses	0:30	0.5
1-Oct-18	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call with client	0:24	0.4
1-Oct-18	Richard Sawyer	Rosario (Richard)	Review	Review docs for RFP response.	4:48	4.8
2-Oct-18	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ client .	0:06	0.1
2-Oct-18	Richard Sawyer	Rosario (Richard)	Review	Review docs for RFP production.	0:12	0.2
3-Oct-18	Richard Sawyer	Rosario (Richard)	Review	Review docs for RFP production	1:06	1.1
3-Oct-18	Richard Sawyer	Rosario (Richard)	Research	Legal research re: discovery	2:00	2.0
3-Oct-18	Richard Sawyer	Rosario (Richard)	Draft	Draft letter for Richard re: Lebron	1:06	1.1
4-Oct-18	Richard Sawyer	Rosario (Richard)	Review	Review and sign protective order	0:42	0.7
4-Oct-18	Richard Sawyer	Rosario (Richard)	Review	Review RFP production	5:48	5.8
4-Oct-18	Richard Sawyer	Rosario (Richard)	Draft	Draft motion to unseal grand jury minutes.	0:30	0.5
5-Oct-18	Richard Sawyer	Rosario (Richard)	Review	Review and revise response to second RFP	0:12	0.2
5-Oct-18	Richard Sawyer	Rosario (Richard)	Draft	Draft joint status letter, revise	1:54	1.9
5-Oct-18	Richard Sawyer	Rosario (Richard)	Correspondence	Read and respond to email from opposing counsel	0:06	0.1
9-Oct-18	Richard Sawyer	Rosario (Richard)	Draft	Draft motion to unseal GJ minutes.	2:36	2.6
9-Oct-18	Richard Sawyer	Rosario (Richard)	Correspondence	Gather documents, send to expert	0:24	0.4
9-Oct-18	Richard Sawyer	Rosario (Richard)	Correspondence	Read and respond to email from opposing counsel	0:06	0.1
9-Oct-18	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ NB & potential expert	0:24	0.4
15-Oct-18	Richard Sawyer	Rosario (Richard)	Review	Review Ds' document production	2:18	2.3
16-Oct-18	Richard Sawyer	Rosario (Richard)	Correspondence	read email from opposing counsel, email NB & EF	0:12	0.2
17-Oct-18	Richard Sawyer	Rosario (Richard)	Correspondence	Emails with opposing counsel, NB, EF, ABH	0:18	0.3
22-Oct-18	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ EF, ABH re: case strategy	0:12	0.2
23-Oct-18	Richard Sawyer	Rosario (Richard)	Deposition	Discuss deposition prep w/ NB	0:12	0.2
23-Oct-18	Richard Sawyer	Rosario (Richard)	Review	Review motion to unseal grand jury	0:12	0.2
24-Oct-18	Richard Sawyer	Rosario (Richard)	Review	Review defendants' pre-motion letter	0:24	0.4
24-Oct-18	Richard Sawyer	Rosario (Richard)	Research	Legal research re: pre-motion letter	0:18	0.3
25-Oct-18	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ ABH re pre-motion letter	0:12	0.2
25-Oct-18	Richard Sawyer	Rosario (Richard)	Review	Research and draft response to pre-motion letter.	7:48	7.8
26-Oct-18	Richard Sawyer	Rosario (Richard)	Draft	letter	6:12	6.2
29-Oct-18	Richard Sawyer	Rosario (Richard)	Correspondence	Contact witness re: interview	0:12	0.2
29-Oct-18	Richard Sawyer	Rosario (Richard)	Draft	Revise pre-motion response	1:36	1.6
29-Oct-18	Richard Sawyer	Rosario (Richard)	Phone Call	Phone message and email to client re: meeting w/ expert	0:06	0.1

30-Oct-18	Richard Sawyer	Rosario (Richard)	Correspondence	email exchange w/ client re: case	0:18	0.3
30-Oct-18	Richard Sawyer	Rosario (Richard)	Draft	Revise, finalize, and file response to pre-motion letter	0:36	0.6
31-Oct-18	Richard Sawyer	Rosario (Richard)	Review	Review docs, prep DA subpoena response for production	0:12	0.2
4-Nov-18	Richard Sawyer	Rosario (Richard)	Research	Legal research for oral argument prep	0:06	0.1
5-Nov-18	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ EF re: court hearing	0:18	0.3
5-Nov-18	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ opposing counsel re: discovery	0:18	0.3
5-Nov-18	Richard Sawyer	Rosario (Richard)	Review	Review defendants' discovery requests	0:30	0.5
5-Nov-18	Richard Sawyer	Rosario (Richard)	Research	Legal research, prep for hearing	0:30	0.5
6-Nov-18	Richard Sawyer	Rosario (Richard)	Prep	Prep for pre-motion conference	1:00	1.0
6-Nov-18	Richard Sawyer	Rosario (Richard)	Court appearance	Appear at pre-motion conference	0:42	0.7
6-Nov-18	Richard Sawyer	Rosario (Richard)	Correspondence	Correspondence w/ investigator re: witness investigation	0:06	0.1
7-Nov-18	Richard Sawyer	Rosario (Richard)	Research	Legal research re: MtD	0:30	0.5
7-Nov-18	Richard Sawyer	Rosario (Richard)	Review	Review documents, research law re: malicious prosecution	1:00	1.0
13-Nov-18	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ expert Agharkar re: RR	0:18	0.3
13-Nov-18	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ client re: meeting with expert	0:18	0.3
19-Nov-18	Richard Sawyer	Rosario (Richard)	Draft	Draft status letter to court	0:18	0.3
20-Nov-18	Richard Sawyer	Rosario (Richard)	Meeting	Meet re: case strategy, planning deps	0:24	0.4
20-Nov-18	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ LK re: case strategy, dep prep, digesting	0:48	0.8
21-Nov-18	Richard Sawyer	Rosario (Richard)	Correspondence	Email Emma re case	0:06	0.1
21-Nov-18	Richard Sawyer	Rosario (Richard)	Review	Review Bronx DA opposition to unsealing motion, call Bronx DA office	1:00	1.0
27-Nov-18	Richard Sawyer	Rosario (Richard)	Research	Legal research for motion to dismiss	0:42	0.7
30-Nov-18	Richard Sawyer	Rosario (Richard)	Review	Review discovery production, emails w/ opposing counsel	1:00	1.0
3-Dec-18	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w opposing counsel re discovery	0:12	0.2
3-Dec-18	Richard Sawyer	Rosario (Richard)	Review	Review documents, identify witnesses for deps	1:00	1.0
3-Dec-18	Richard Sawyer	Rosario (Richard)	Digest	Digest trial, pretrial hearing for dep prep	1:12	1.2
4-Dec-18	Richard Sawyer	Rosario (Richard)	Research	Digest trial	0:36	0.6
4-Dec-18	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call to Richard	0:24	0.4
4-Dec-18	Richard Sawyer	Rosario (Richard)	Meeting	Meet re case strategy w NB, EF, LK	0:24	0.4
7-Dec-18	Richard Sawyer	Rosario (Richard)	Review	Review docs for Ds' discovery demands	0:06	0.1
7-Dec-18	Richard Sawyer	Rosario (Richard)	Review	Review documents for dep prep	0:24	0.4
10-Dec-18	Richard Sawyer	Rosario (Richard)	Correspondence	Redact inadvertently produced doc, email to opposing counsel re: doc, dep scheduling	0:36	0.6
10-Dec-18	Richard Sawyer	Rosario (Richard)	Correspondence	Email w/ investigator re: witness investigation	0:18	0.3
11-Dec-18	Richard Sawyer	Rosario (Richard)	Digest	Digest trial	0:30	0.5



12-Dec-18	Richard Sawyer	Rosario (Richard)	Digest	Digest trial	3:12	3.2
12-Dec-18	Richard Sawyer	Rosario (Richard)	Correspondence	Correspondence w/ opposing counsel	0:06	0.1
12-Dec-18	Richard Sawyer	Rosario (Richard)	Correspondence	Correspondence w/ client	0:24	0.4
14-Dec-18	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ NB, EF, AF re: deposition scheduling	0:18	0.3
14-Dec-18	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ client, follow-up email	0:24	0.4
14-Dec-18	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ ABH re: motion briefing	0:12	0.2
14-Dec-18	Richard Sawyer	Rosario (Richard)	Correspondence	response	0:36	0.6
14-Dec-18	Richard Sawyer	Rosario (Richard)	Digest	Digest trial	2:42	2.7
14-Dec-18	Richard Sawyer	Rosario (Richard)	Review	Review motion to dismiss for response	1:00	1.0
16-Dec-18	Richard Sawyer	Rosario (Richard)	Digest	Digest trial	5:18	5.3
17-Dec-18	Richard Sawyer	Rosario (Richard)	Review	Review email from opposing counsel	0:06	0.1
17-Dec-18	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ NB, EF, LK re: deposition scheduling	0:12	0.2
17-Dec-18	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ client	0:18	0.3
17-Dec-18	Richard Sawyer	Rosario (Richard)	Correspondence	Find investigator in California	0:06	0.1
17-Dec-18	Richard Sawyer	Rosario (Richard)	Correspondence	Correspondence w/ witness	0:06	0.1
17-Dec-18	Richard Sawyer	Rosario (Richard)	Correspondence	Respond to opposing counsel's email	0:18	0.3
17-Dec-18	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ ABH re: MtD opp	0:48	0.8
17-Dec-18	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ NB, EF, and LK re: discovery dispute	0:18	0.3
17-Dec-18	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ opposing counsel re: deposition scheduling	0:18	0.3
17-Dec-18	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ witness	0:18	0.3
17-Dec-18	Richard Sawyer	Rosario (Richard)	Draft	Draft letter to Court	2:00	2.0
17-Dec-18	Richard Sawyer	Rosario (Richard)	Review	Review documents for dep prep	0:30	0.5
18-Dec-18	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ NB, EF, LK re: witness interview	0:06	0.1
18-Dec-18	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ client	0:18	0.3
18-Dec-18	Richard Sawyer	Rosario (Richard)	Review	Review unredacted disciplinary histories at opposing counsel's office	0:36	0.6
18-Dec-18	Richard Sawyer	Rosario (Richard)	Review	Review docs for dep prep	0:06	0.1
18-Dec-18	Richard Sawyer	Rosario (Richard)	Research	Legal research for MtD opp	2:36	2.6
18-Dec-18	Richard Sawyer	Rosario (Richard)	Draft	Draft letter to Court.	3:42	3.7
19-Dec-18	Richard Sawyer	Rosario (Richard)	Research	Legal research re: opp to MtD	7:06	7.1
19-Dec-18	Richard Sawyer	Rosario (Richard)	Phone Call	Phone calls to Richard and Chip	0:12	0.2
20-Dec-18	Richard Sawyer	Rosario (Richard)	Correspondence	Read and respond to opposing counsel's email	0:06	0.1
20-Dec-18	Richard Sawyer	Rosario (Richard)	Draft	Discuss w/ EF, NB, and draft deposition scheduling email to opposing counsel	0:30	0.5

20-Dec-18	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ opposing counsel re: deposition scheduling	0:12	0.2
20-Dec-18	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ EF re opp to MtD strategy	0:30	0.5
20-Dec-18	Richard Sawyer	Rosario (Richard)	Court appearance	Phone conference re discovery dispute	0:30	0.5
20-Dec-18	Richard Sawyer	Rosario (Richard)	Draft	Research and draft opp to MtD	3:48	3.8
21-Dec-18	Richard Sawyer	Rosario (Richard)	Review	Inspect police file	1:30	1.5
21-Dec-18	Richard Sawyer	Rosario (Richard)	Correspondence	Read/respond to emails from opposing counsel	0:12	0.2
21-Dec-18	Richard Sawyer	Rosario (Richard)	Draft	review	0:18	0.3
21-Dec-18	Richard Sawyer	Rosario (Richard)	Draft	Draft opp to MtD	2:12	2.2
22-Dec-18	Richard Sawyer	Rosario (Richard)	Draft	Draft opp to MtD	2:06	2.1
24-Dec-18	Richard Sawyer	Rosario (Richard)	Correspondence	Read and respond to emails from opposing counsel re: deposition scheduling	0:36	0.6
26-Dec-18	Richard Sawyer	Rosario (Richard)	Correspondence	Read and respond to emails re: deposition scheduling	0:36	0.6
26-Dec-18	Richard Sawyer	Rosario (Richard)	Review	Read defendants' motion for reconsideration, discuss w/ EF and NB	0:42	0.7
27-Dec-18	Richard Sawyer	Rosario (Richard)	Research	Legal research concerning motion for reconsideration	0:12	0.2
27-Dec-18	Richard Sawyer	Rosario (Richard)	Correspondence	Draft email to opposing counsel re: deposition scheduling	0:24	0.4
27-Dec-18	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ NB re: deposition scheduling, motion for reconsideration	0:18	0.3
28-Dec-18	Richard Sawyer	Rosario (Richard)	Correspondence	Read letter from Defendants, email to defense counsel about filing deadline	0:18	0.3
28-Dec-18	Richard Sawyer	Rosario (Richard)	Draft	Draft letter to Court re: deposition scheduling	1:48	1.8
28-Dec-18	Richard Sawyer	Rosario (Richard)	Draft	Revisions to letter re: deposition scheduling	1:06	1.1
30-Dec-18	Richard Sawyer	Rosario (Richard)	Draft	Draft response to MtD	6:24	6.4
31-Dec-18	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ NB re: deposition scheduling, case to-dos list	0:24	0.4
31-Dec-18	Richard Sawyer	Rosario (Richard)	Prep	Prep for fact witness depositions, get material together, review documents	0:36	0.6
31-Dec-18	Richard Sawyer	Rosario (Richard)	Draft	Draft opp to MtD	6:06	6.1
1-Jan-19	Richard Sawyer	Rosario (Richard)	Draft	Draft opp to MtD	6:30	6.5
2-Jan-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ ABH re: opp to MtD	0:24	0.4
2-Jan-19	Richard Sawyer	Rosario (Richard)	Meeting	Assign tasks to Ali re: depositions, etc.	0:18	0.3
2-Jan-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ EF re: deposition scheduling, MtD opp	0:24	0.4
2-Jan-19	Richard Sawyer	Rosario (Richard)	Phone Call	Call private investigator re: witness research, subpoena service	0:24	0.4
2-Jan-19	Richard Sawyer	Rosario (Richard)	Draft	Draft letter to witness	0:42	0.7
2-Jan-19	Richard Sawyer	Rosario (Richard)	Correspondence	Email to witnesses re: availability	0:12	0.2

2-Jan-19	Richard Sawyer	Rosario (Richard)	Draft	Draft opp to MtD	4:36	4.6
3-Jan-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ EF, LK re: case strategy, responsibilities, dep prep	0:48	0.8
3-Jan-19	Richard Sawyer	Rosario (Richard)	Draft	Draft opp to MtD	8:06	8.1
3-Jan-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call to Bronx DA re subpoena	0:06	0.1
3-Jan-19	Richard Sawyer	Rosario (Richard)	Correspondence	Correspondence w/ investigator re: witness	0:06	0.1
4-Jan-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ NB, LK re: deposition scheduling, case strategy	0:18	0.3
4-Jan-19	Richard Sawyer	Rosario (Richard)	Draft	Draft opp to MtD	4:54	4.9
4-Jan-19	Richard Sawyer	Rosario (Richard)	Draft	Respond to discovery requests.	0:36	0.6
4-Jan-19	Richard Sawyer	Rosario (Richard)	Draft	Draft letter to court in response to reconsideration motion	4:54	4.9
5-Jan-19	Richard Sawyer	Rosario (Richard)	Draft	Revise letter to court re: reconsideration motion	2:06	2.1
6-Jan-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ ABH re: MtD opp, review proposed edits.	0:42	0.7
6-Jan-19	Richard Sawyer	Rosario (Richard)	Draft	Revise opp to MtD.	0:42	0.7
7-Jan-19	Richard Sawyer	Rosario (Richard)	Draft	Revise letter opp to reconsideration	1:42	1.7
7-Jan-19	Richard Sawyer	Rosario (Richard)	Phone Call	Call DA's office re: transcripts	0:06	0.1
7-Jan-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ EF, AF & witness	0:24	0.4
7-Jan-19	Richard Sawyer	Rosario (Richard)	Draft	Revise and file letter opp to reconsideration motion	1:00	1.0
7-Jan-19	Richard Sawyer	Rosario (Richard)	Draft	Review opp to MtD	2:54	2.9
8-Jan-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ expert & EF	0:06	0.1
8-Jan-19	Richard Sawyer	Rosario (Richard)	Review	Review opposing counsel's reply letter	0:12	0.2
8-Jan-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ opposing counsel re: deps	0:36	0.6
8-Jan-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ NB, EF, AF re: dep scheduling.	0:12	0.2
8-Jan-19	Richard Sawyer	Rosario (Richard)	Draft	Draft follow-up email re: dep scheduling	0:24	0.4
8-Jan-19	Richard Sawyer	Rosario (Richard)	Draft	Revise opp to MtD	2:48	2.8
9-Jan-19	Richard Sawyer	Rosario (Richard)	Draft	Revise opp to MtD	3:54	3.9
9-Jan-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ investigator re: witness investigation	0:12	0.2
9-Jan-19	Richard Sawyer	Rosario (Richard)	Draft	Draft email to opposing counsel re: deposition scheduling	0:12	0.2
9-Jan-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ NB, EF, LK, AF re: case strategy, deposition prep	0:42	0.7
10-Jan-19	Richard Sawyer	Rosario (Richard)	Draft	Revise opp to MtD	6:06	6.1
11-Jan-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ Bronx DA re: subpoena production	0:06	0.1
11-Jan-19	Richard Sawyer	Rosario (Richard)	Draft	Draft subpoenas and correspondence to witnesses	0:24	0.4
11-Jan-19	Richard Sawyer	Rosario (Richard)	Deposition	Deposition planning	0:24	0.4
11-Jan-19	Richard Sawyer	Rosario (Richard)	Research	Legal research on discovery issue	0:24	0.4
11-Jan-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ client	0:24	0.4
11-Jan-19	Richard Sawyer	Rosario (Richard)	Digest	Digest 440 testimony	1:42	1.7

11-Jan-19	Richard Sawyer	Rosario (Richard)	Research	Legal research for opp to MtD	1:42	1.7
13-Jan-19	Richard Sawyer	Rosario (Richard)	Draft	Revise opp to MtD	2:48	2.8
13-Jan-19	Richard Sawyer	Rosario (Richard)	Digest	Digest wit testimony for dep prep	0:48	0.8
14-Jan-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ NB and investigator re: witness investigation	0:24	0.4
14-Jan-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone calls to witnesses re: deposition scheduling	0:18	0.3
14-Jan-19	Richard Sawyer	Rosario (Richard)	Prep	Dep prep--alibi wits	2:42	2.7
14-Jan-19	Richard Sawyer	Rosario (Richard)	Draft	Revise opp to MtD	1:18	1.3
15-Jan-19	Richard Sawyer	Rosario (Richard)	Draft	Revise and file opp to MtD	5:18	5.3
15-Jan-19	Richard Sawyer	Rosario (Richard)	Prep	Prep for deps	0:48	0.8
15-Jan-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call 2 w/ investigator re: witness	0:12	0.2
15-Jan-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ witness re: deposition scheduling	0:18	0.3
15-Jan-19	Richard Sawyer	Rosario (Richard)	Correspondence	Email to team re: witness scheduling	0:06	0.1
15-Jan-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call 2 w/ witness re: deposition scheduling	0:18	0.3
15-Jan-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ investigator re: witness investigation .	0:12	0.2
15-Jan-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ NB, EF, LK, and AF re: deposition strategy	0:54	0.9
16-Jan-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ investigator re witness	0:54	0.9
16-Jan-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ NB, AF re case	1:18	1.3
16-Jan-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ wit re deposition scheduling	0:12	0.2
18-Jan-19	Richard Sawyer	Rosario (Richard)	Prep	Dep prep alibi wits	5:36	5.6
23-Jan-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call to opposing counsel, email to opposing counsel summarizing call.	0:24	0.4
23-Jan-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ client re: dep prep	1:24	1.4
23-Jan-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ EF re: discovery responses	0:30	0.5
23-Jan-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ Richard re: discovery responses	0:36	0.6
23-Jan-19	Richard Sawyer	Rosario (Richard)	Correspondence	Email to team re phone call w/ Richard	0:12	0.2
23-Jan-19	Richard Sawyer	Rosario (Richard)	Prep	Deposition prep--digesting, etc--for Richard	3:36	3.6
23-Jan-19	Richard Sawyer	Rosario (Richard)	Phone Call	Dep prep phone call w/ NB, Richard	1:00	1.0
24-Jan-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ client re discovery responses	0:12	0.2
24-Jan-19	Richard Sawyer	Rosario (Richard)	Prep	Deposition prep for alibi witnesses	5:48	5.8
24-Jan-19	Richard Sawyer	Rosario (Richard)	Correspondence	Email to opposing counsel re discovery	0:24	0.4
24-Jan-19	Richard Sawyer	Rosario (Richard)	Meeting	Team meeting w/ NB, LK, and AF	0:36	0.6
24-Jan-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ witness re: deposition scheduling	0:18	0.3
25-Jan-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ EF re: discovery response and demands	0:18	0.3
25-Jan-19	Richard Sawyer	Rosario (Richard)	Draft	Draft discovery response.	2:24	2.4

25-Jan-19	Richard Sawyer	Rosario (Richard)	Draft	Draft discovery demands.	1:48	1.8
25-Jan-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ Richard re: discovery responses	0:30	0.5
25-Jan-19	Richard Sawyer	Rosario (Richard)	Review	Review video for discovery response	2:30	2.5
25-Jan-19	Richard Sawyer	Rosario (Richard)	Meeting	Meeting w/ NB, EF, LK, AF re: case strategy and deps	0:24	0.4
28-Jan-19	Richard Sawyer	Rosario (Richard)	Draft	Compile and send discovery responses	6:36	6.6
28-Jan-19	Richard Sawyer	Rosario (Richard)	Draft	Revise discovery responses	1:00	1.0
28-Jan-19	Richard Sawyer	Rosario (Richard)	Draft	Revise discovery demands	0:24	0.4
28-Jan-19	Richard Sawyer	Rosario (Richard)	Prep	Richard dep prep	4:06	4.1
29-Jan-19	Richard Sawyer	Rosario (Richard)	Deposition	Deposition of Michael Sanchez	6:30	6.5
29-Jan-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ Richard re: dep, dep prep	0:18	0.3
30-Jan-19	Richard Sawyer	Rosario (Richard)	Deposition	Deposition of Robert Davis	3:00	3.0
30-Jan-19	Richard Sawyer	Rosario (Richard)	Meeting	Team meeting w/ NB, EF, LK, AF re: deposition	0:12	0.2
30-Jan-19	Richard Sawyer	Rosario (Richard)	Review	Review Rule 26 updates	0:12	0.2
30-Jan-19	Richard Sawyer	Rosario (Richard)	Draft	Draft discovery email to opposing counsel	2:06	2.1
30-Jan-19	Richard Sawyer	Rosario (Richard)	Prep	Dep prep for alibi witnesses	1:36	1.6
31-Jan-19	Richard Sawyer	Rosario (Richard)	Review	Review Ds' MtD reply brief	0:12	0.2
31-Jan-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet re: dep prep	0:24	0.4
31-Jan-19	Richard Sawyer	Rosario (Richard)	Prep	Prep for Richard's dep	5:24	5.4
1-Feb-19	Richard Sawyer	Rosario (Richard)	Digest	Digest police file	1:42	1.7
1-Feb-19	Richard Sawyer	Rosario (Richard)	Prep	Prep Richard for deposition	4:00	4.0
1-Feb-19	Richard Sawyer	Rosario (Richard)	Prep	Dep prep for alibi wits	1:30	1.5
3-Feb-19	Richard Sawyer	Rosario (Richard)	Prep	Prep for alibi witness deps	6:54	6.9
3-Feb-19	Richard Sawyer	Rosario (Richard)	Prep	Prep for Richard's dep	1:06	1.1
4-Feb-19	Richard Sawyer	Rosario (Richard)	Prep	Dep prep for police witnesses	2:12	2.2
4-Feb-19	Richard Sawyer	Rosario (Richard)	Prep	Dep prep with Richard in office	2:24	2.4
4-Feb-19	Richard Sawyer	Rosario (Richard)	Prep	Dep prep: alibi wits	0:30	0.5
4-Feb-19	Richard Sawyer	Rosario (Richard)	Research	Review docs for response to Ds' discovery question	0:36	0.6
4-Feb-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ opposing counsel	0:12	0.2
5-Feb-19	Richard Sawyer	Rosario (Richard)	Prep	Prep for Richard's dep	3:36	3.6
5-Feb-19	Richard Sawyer	Rosario (Richard)	Prep	Prep for alibi witness deps	1:36	1.6
6-Feb-19	Richard Sawyer	Rosario (Richard)	Prep	Prep for Richard's dep	0:48	0.8
6-Feb-19	Richard Sawyer	Rosario (Richard)	Deposition	Deposition of Richard Rosario	8:18	8.3
7-Feb-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ NB, EF, LK, AF re: case strategy and depositions	0:36	0.6
8-Feb-19	Richard Sawyer	Rosario (Richard)	Prep	Dep prep w/ Chip Loewenson	2:00	2.0



8-Feb-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call to client re: case strategy, offer of judgment, discovery material	0:30	0.5
9-Feb-19	Richard Sawyer	Rosario (Richard)	Draft	Draft discovery letter	3:06	3.1
10-Feb-19	Richard Sawyer	Rosario (Richard)	Draft	Revise discovery letter, send to team	1:06	1.1
10-Feb-19	Richard Sawyer	Rosario (Richard)	Prep	Witness prep for depositions w/ LK	2:48	2.8
10-Feb-19	Richard Sawyer	Rosario (Richard)	Prep	Review docs to prep for witness deps	1:06	1.1
11-Feb-19	Richard Sawyer	Rosario (Richard)	Deposition	Deposition of John Torres	4:30	4.5
11-Feb-19	Richard Sawyer	Rosario (Richard)	Deposition	Deposition of Ferndando Torres	2:42	2.7
11-Feb-19	Richard Sawyer	Rosario (Richard)	Prep	Prep for deposition of Jenine Torres	2:06	2.1
11-Feb-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ Richard re: deps, case strategy	0:36	0.6
12-Feb-19	Richard Sawyer	Rosario (Richard)	Deposition	Deposition of Jenine Torres	3:00	3.0
12-Feb-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ Richard re: deps, case strategy, discovery	0:30	0.5
13-Feb-19	Richard Sawyer	Rosario (Richard)	Correspondence	Email to opposing counsel re: discovery	0:06	0.1
13-Feb-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ EF re: Chip dep	0:24	0.4
14-Feb-19	Richard Sawyer	Rosario (Richard)	Prep	Dep prep, police deps	4:54	4.9
15-Feb-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ potential witness	1:06	1.1
18-Feb-19	Richard Sawyer	Rosario (Richard)	Prep	Police depositions dep prep	5:48	5.8
18-Feb-19	Richard Sawyer	Rosario (Richard)	Draft	Draft joint status letter to court	0:30	0.5
18-Feb-19	Richard Sawyer	Rosario (Richard)	Draft	Revise discovery motion for more deps	0:36	0.6
19-Feb-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ opposing counsel	0:12	0.2
19-Feb-19	Richard Sawyer	Rosario (Richard)	Correspondence	Email to opposing counsel	0:06	0.1
19-Feb-19	Richard Sawyer	Rosario (Richard)	Draft	Finalize and file status letter	0:12	0.2
19-Feb-19	Richard Sawyer	Rosario (Richard)	Prep	Prep for police deps	6:42	6.7
20-Feb-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ NB, AF re: police depositions	0:24	0.4
20-Feb-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ Richard re: discovery, case strategy	0:48	0.8
20-Feb-19	Richard Sawyer	Rosario (Richard)	Prep	Dep prep--police deps	2:18	2.3
21-Feb-19	Richard Sawyer	Rosario (Richard)	Prep	Prep for police deps	6:12	6.2
21-Feb-19	Richard Sawyer	Rosario (Richard)	Review	Review defendants' response letter to motion for more deps	0:12	0.2
25-Feb-19	Richard Sawyer	Rosario (Richard)	Prep	Deposition prep for police deps	1:12	1.2
26-Feb-19	Richard Sawyer	Rosario (Richard)	Review	Review videos from client for discovery production	0:24	0.4
26-Feb-19	Richard Sawyer	Rosario (Richard)	Prep	Police dep prep	1:36	1.6
27-Feb-19	Richard Sawyer	Rosario (Richard)	Prep	Prep for police dep	0:48	0.8
27-Feb-19	Richard Sawyer	Rosario (Richard)	Deposition	Deposition of defendant Martinez	8:42	8.7
27-Feb-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ opposing counsel, NB re: scheduling	0:12	0.2
28-Feb-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ client re: discovery and mediation	0:36	0.6

28-Feb-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ opposing counsel re: mediation and expert deadline scheduling	0:12	0.2
28-Feb-19	Richard Sawyer	Rosario (Richard)	Correspondence	Email to team re: phone call w/ opposing counsel	0:06	0.1
28-Feb-19	Richard Sawyer	Rosario (Richard)	Prep	Prep for Whitaker dep	4:42	4.7
4-Mar-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ NB, LK, AF re: case strategy, deposition planning	0:36	0.6
5-Mar-19	Richard Sawyer	Rosario (Richard)	Deposition	Deposition of Charles Cruger	5:18	5.3
5-Mar-19	Richard Sawyer	Rosario (Richard)	Prep	Prep for dep of Charles Cruger	0:18	0.3
5-Mar-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ NB re: Cruger dep	0:12	0.2
7-Mar-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ expert re: report deadline, substance	0:18	0.3
7-Mar-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ NB, potential expert	0:48	0.8
7-Mar-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ NB re: experts	0:18	0.3
7-Mar-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ NB, LK, AF re: case strategy, remaining discovery	0:48	0.8
8-Mar-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ opposing counsel re: discovery scheduling	0:30	0.5
8-Mar-19	Richard Sawyer	Rosario (Richard)	Correspondence	Draft email to opposing counsel re: discovery call	0:18	0.3
8-Mar-19	Richard Sawyer	Rosario (Richard)	Correspondence	Email to mediator re: mediation	1:06	1.1
19-Mar-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone conference w/ opposing counsel and NBC re: subpoena dispute	0:30	0.5
19-Mar-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ investigator, LK re: witness research	0:12	0.2
19-Mar-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ client re: expert scheduling, discovery	0:12	0.2
19-Mar-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ LK, NB, EF re: case strategy, depositions	1:12	1.2
20-Mar-19	Richard Sawyer	Rosario (Richard)	Correspondence	Email to client re: experts	0:06	0.1
20-Mar-19	Richard Sawyer	Rosario (Richard)	Correspondence	Read and respond to email from opposing counsel	0:06	0.1
20-Mar-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ Nicole Torres re: dep and scheduling	0:18	0.3
20-Mar-19	Richard Sawyer	Rosario (Richard)	Correspondence	Email to team re: Nicole Torres	0:06	0.1
20-Mar-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ opposing counsel re: deps scheduling	0:18	0.3
20-Mar-19	Richard Sawyer	Rosario (Richard)	Correspondence	Email to team re: dep scheduling, call w/ Brachah	0:06	0.1
20-Mar-19	Richard Sawyer	Rosario (Richard)	Phone Call	Call to Michael Sanchez to schedule dep	0:06	0.1
20-Mar-19	Richard Sawyer	Rosario (Richard)	Review	Review documents for discovery production, meet w/ EF re: discovery response	0:30	0.5
20-Mar-19	Richard Sawyer	Rosario (Richard)	Draft	Email to opposing counsel re: deposition scheduling, additional deps	0:12	0.2
20-Mar-19	Richard Sawyer	Rosario (Richard)	Correspondence	Email witnesses re: deposition date changes.	0:06	0.1
20-Mar-19	Richard Sawyer	Rosario (Richard)	Phone Call	phone call w/ Bronx DA re subpoena	0:06	0.1
20-Mar-19	Richard Sawyer	Rosario (Richard)	Draft	Review supplemental authority; draft letter to Court	1:00	1.0
20-Mar-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ client re: discovery	0:24	0.4

20-Mar-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ EF re: discovery responses	0:12	0.2
20-Mar-19	Richard Sawyer	Rosario (Richard)	Review	Review discovery for production	0:30	0.5
20-Mar-19	Richard Sawyer	Rosario (Richard)	Correspondence	Draft letter to court re: deps request	0:42	0.7
20-Mar-19	Richard Sawyer	Rosario (Richard)	Correspondence	Email to EF re: discovery response	0:12	0.2
20-Mar-19	Richard Sawyer	Rosario (Richard)	Correspondence	Email to expert Agharkar	0:06	0.1
21-Mar-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ Nick re: expert scheduling	0:12	0.2
21-Mar-19	Richard Sawyer	Rosario (Richard)	Correspondence	Read and respond to two discovery emails from opposing counsel .	1:06	1.1
21-Mar-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ Minerva	0:18	0.3
21-Mar-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ Emma and Chip	0:18	0.3
21-Mar-19	Richard Sawyer	Rosario (Richard)	Correspondence	Email to Chip re: discovery request	0:06	0.1
21-Mar-19	Richard Sawyer	Rosario (Richard)	Review	Review documents for discovery production	1:06	1.1
21-Mar-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ expert Agharkar and NB	0:24	0.4
22-Mar-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ Brachah re: discovery issues	0:30	0.5
22-Mar-19	Richard Sawyer	Rosario (Richard)	Correspondence	Email to Brachah re: discovery call	0:18	0.3
29-Mar-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ EF re: discovery responses	0:18	0.3
29-Mar-19	Richard Sawyer	Rosario (Richard)	Meeting	experts	0:30	0.5
29-Mar-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ opposing counsel re: discovery	0:12	0.2
29-Mar-19	Richard Sawyer	Rosario (Richard)	Draft	Draft email to opposing counsel summarizing discovery call	0:24	0.4
29-Mar-19	Richard Sawyer	Rosario (Richard)	Phone Call	investigation	0:18	0.3
29-Mar-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ NB, LK re: investigation	0:06	0.1
29-Mar-19	Richard Sawyer	Rosario (Richard)	Prep	Dep prep for Nicole Torres	0:48	0.8
31-Mar-19	Richard Sawyer	Rosario (Richard)	Review	Read email from opposing counsel .	0:06	0.1
1-Apr-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ EF, AF re: discovery responses	0:42	0.7
1-Apr-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ opposing counsel	0:18	0.3
1-Apr-19	Richard Sawyer	Rosario (Richard)	Draft	Draft letter to renew motion for more deps	1:12	1.2
1-Apr-19	Richard Sawyer	Rosario (Richard)	Review	Review defendants' discovery requests, make notes	0:18	0.3
1-Apr-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ NB, LK, AF re: Nicole Torres prep	0:54	0.9
2-Apr-19	Richard Sawyer	Rosario (Richard)	Review	Review documents for discovery response	0:30	0.5
2-Apr-19	Richard Sawyer	Rosario (Richard)	Review	Review documents for production	1:06	1.1
2-Apr-19	Richard Sawyer	Rosario (Richard)	Prep	Witness interview/prep for deposition	0:54	0.9
2-Apr-19	Richard Sawyer	Rosario (Richard)	Draft	Draft discovery responses	2:30	2.5
3-Apr-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ client re: discovery	0:42	0.7
3-Apr-19	Richard Sawyer	Rosario (Richard)	Deposition	Deposition of Nicole Torres	2:00	2.0
3-Apr-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ expert Agharkar	0:30	0.5



3-Apr-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ EF re: request to admit responses	0:24	0.4
3-Apr-19	Richard Sawyer	Rosario (Richard)	Draft	Draft and file joint status letter	0:30	0.5
3-Apr-19	Richard Sawyer	Rosario (Richard)	Draft	Revise RTA responses	1:12	1.2
3-Apr-19	Richard Sawyer	Rosario (Richard)	Correspondence	Email to team	0:12	0.2
4-Apr-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ client re: discovery	0:24	0.4
4-Apr-19	Richard Sawyer	Rosario (Richard)	Draft	Revise and file letter motion for more deps	0:48	0.8
4-Apr-19	Richard Sawyer	Rosario (Richard)	Draft	Draft email to Brachah re: ESI search terms	2:12	2.2
4-Apr-19	Richard Sawyer	Rosario (Richard)	Review	Review documents for discovery production	1:06	1.1
8-Apr-19	Richard Sawyer	Rosario (Richard)	Phone Call	Read email from opposing counsel, call opposing counsel for a meet-and-confer w/ NB & EF	0:54	0.9
8-Apr-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ NB, LK, AF, and expert. Debrief after call	0:42	0.7
8-Apr-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ NB, LK, expert	0:30	0.5
8-Apr-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ prospective expert	0:12	0.2
8-Apr-19	Richard Sawyer	Rosario (Richard)	Review	Review Defendants' discovery production	0:24	0.4
9-Apr-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ expert re: report	0:18	0.3
9-Apr-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ client re: discovery	0:24	0.4
9-Apr-19	Richard Sawyer	Rosario (Richard)	Phone Call	date)	0:12	0.2
9-Apr-19	Richard Sawyer	Rosario (Richard)	Correspondence	Email w/ expert	0:06	0.1
9-Apr-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ EF re: discovery responses	0:48	0.8
9-Apr-19	Richard Sawyer	Rosario (Richard)	Correspondence	Draft email to opposing counsel re: discovery issues	0:30	0.5
10-Apr-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ expert	0:12	0.2
10-Apr-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ client re: discovery	0:18	0.3
10-Apr-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call and follow-up email w/ Joyce Hartsfield	0:18	0.3
10-Apr-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ Richard re: discovery	0:42	0.7
10-Apr-19	Richard Sawyer	Rosario (Richard)	Research	Legal research for appellate reply brief	2:36	2.6
10-Apr-19	Richard Sawyer	Rosario (Richard)	Meeting	Meeting w/ EF, AF re: discovery production	0:24	0.4
10-Apr-19	Richard Sawyer	Rosario (Richard)	Correspondence	Email to opposing counsel re: discovery	0:12	0.2
10-Apr-19	Richard Sawyer	Rosario (Richard)	Research	Legal research re: discovery	1:06	1.1
10-Apr-19	Richard Sawyer	Rosario (Richard)	Review	Review Richard's deposition	0:06	0.1
10-Apr-19	Richard Sawyer	Rosario (Richard)	Meeting	Meeting w/ Ali to assign discovery tasks	0:18	0.3
11-Apr-19	Richard Sawyer	Rosario (Richard)	Draft	Draft requests for admission	0:48	0.8
11-Apr-19	Richard Sawyer	Rosario (Richard)	Review	Review documents for discovery production	0:36	0.6
11-Apr-19	Richard Sawyer	Rosario (Richard)	Research	Legal research re: discovery	0:24	0.4
11-Apr-19	Richard Sawyer	Rosario (Richard)	Phone Call	Contact process servers in Florida and North Carolina	0:18	0.3

11-Apr-19	Richard Sawyer	Rosario (Richard)	Correspondence	Email to opposing counsel re: discovery	0:12	0.2
12-Apr-19	Richard Sawyer	Rosario (Richard)	Correspondence	Email w/ opposing counsel re: discovery	0:06	0.1
12-Apr-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ AF, EF re: document production	0:30	0.5
12-Apr-19	Richard Sawyer	Rosario (Richard)	Review	Review expert report	0:48	0.8
12-Apr-19	Richard Sawyer	Rosario (Richard)	Correspondence	Review discovery requests, email opposing counsel	0:24	0.4
12-Apr-19	Richard Sawyer	Rosario (Richard)	Draft	Draft requests for admission	0:54	0.9
12-Apr-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ NB, EF, LK, AF re: psych expert report	0:24	0.4
12-Apr-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ NB, EF re: requests to admit	0:18	0.3
12-Apr-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ client re: discovery	0:18	0.3
15-Apr-19	Richard Sawyer	Rosario (Richard)	Draft	Draft letter for protective order	5:06	5.1
15-Apr-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ NB, LK re: case scheduling, deps	0:30	0.5
16-Apr-19	Richard Sawyer	Rosario (Richard)	Draft	Draft protective order request	1:18	1.3
16-Apr-19	Richard Sawyer	Rosario (Richard)	Review	Review discovery for production to Defendants	0:24	0.4
16-Apr-19	Richard Sawyer	Rosario (Richard)	Correspondence	Email to expert	0:06	0.1
16-Apr-19	Richard Sawyer	Rosario (Richard)	Draft	Revise discovery requests, send to opposing counsel.	0:30	0.5
16-Apr-19	Richard Sawyer	Rosario (Richard)	Review	Review electronic discovery for production	0:36	0.6
16-Apr-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ richard re: case	0:12	0.2
16-Apr-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ NB, LK & expert Agharkar re: expert report	0:24	0.4
17-Apr-19	Richard Sawyer	Rosario (Richard)	Review	Review Sanchez dep to prep for Sanchez part 2.	1:18	1.3
17-Apr-19	Richard Sawyer	Rosario (Richard)	Review	Review McDonough oral argument for MtD	0:42	0.7
17-Apr-19	Richard Sawyer	Rosario (Richard)	Draft	Review production, draft discovery responses	2:54	2.9
17-Apr-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ Ali re: remaining discovery to produce.	0:18	0.3
18-Apr-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ EF re: discovery responses	0:18	0.3
18-Apr-19	Richard Sawyer	Rosario (Richard)	Review	Review documents for production, revise discovery responses.	2:54	2.9
18-Apr-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ Richard re: discovery	0:18	0.3
18-Apr-19	Richard Sawyer	Rosario (Richard)	Review	Review expert report, notes for editing.	1:24	1.4
19-Apr-19	Richard Sawyer	Rosario (Richard)	Review	Reformat discovery production and send to defendants.	0:30	0.5
19-Apr-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ witness Guanica Collazo re: dep	0:12	0.2
19-Apr-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ LK re: case strategy, planning	0:12	0.2
19-Apr-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ neuropsych expert	0:18	0.3
19-Apr-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ Chip Loewenson re: discovery.	0:30	0.5
19-Apr-19	Richard Sawyer	Rosario (Richard)	Draft	Revise letter motion for protective order, email to Chip for review	1:24	1.4
19-Apr-19	Richard Sawyer	Rosario (Richard)	Draft	Revise expert report	1:12	1.2

22-Apr-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ NB & LK re: Sanchez dep	1:00	1.0
22-Apr-19	Richard Sawyer	Rosario (Richard)	Correspondence	Read and respond to email from opposing counsel.	0:12	0.2
22-Apr-19	Richard Sawyer	Rosario (Richard)	Digest	Digest testimony for dep prep--Sanchez dep	0:54	0.9
22-Apr-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ witness Lymari Leon	0:06	0.1
22-Apr-19	Richard Sawyer	Rosario (Richard)	Meeting	meet w/ LK & NB re: deps and scheduling	0:12	0.2
22-Apr-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ witness Michael Sanchez re: scheduling	0:06	0.1
22-Apr-19	Richard Sawyer	Rosario (Richard)	Review	Review robbery documents	0:24	0.4
22-Apr-19	Richard Sawyer	Rosario (Richard)	Draft	Revise expert report	3:12	3.2
23-Apr-19	Richard Sawyer	Rosario (Richard)	Correspondence	Read and respond to email from opposing counsel	0:24	0.4
23-Apr-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ opposing counsel (meet & confer)	0:30	0.5
23-Apr-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ consulting expert Shaffer	0:12	0.2
23-Apr-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ NB re: expert	0:06	0.1
23-Apr-19	Richard Sawyer	Rosario (Richard)	Correspondence	Read and respond to email from opposing counsel re: meet and confer	0:24	0.4
23-Apr-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ EF re: expert	0:06	0.1
23-Apr-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ client re: discovery	0:12	0.2
23-Apr-19	Richard Sawyer	Rosario (Richard)	Review	Review discovery production to prep for call w/ opposing counsel	0:18	0.3
23-Apr-19	Richard Sawyer	Rosario (Richard)	Correspondence	Email to Richard re: discovery	0:12	0.2
23-Apr-19	Richard Sawyer	Rosario (Richard)	Correspondence	Read opposing counsel's discovery follow-up email, legal research, review docs, respond	1:18	1.3
23-Apr-19	Richard Sawyer	Rosario (Richard)	Draft	Revise expert report	4:00	4.0
24-Apr-19	Richard Sawyer	Rosario (Richard)	Prep	Prep for Sanchez dep.	1:06	1.1
24-Apr-19	Richard Sawyer	Rosario (Richard)	Deposition	Sanchez dep part two	4:54	4.9
24-Apr-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ opposing counsel	0:06	0.1
24-Apr-19	Richard Sawyer	Rosario (Richard)	Correspondence	Research issue w/ Bates stamps and email opposing counsel	0:18	0.3
24-Apr-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ witness Guanica Collazo	0:12	0.2
25-Apr-19	Richard Sawyer	Rosario (Richard)	Correspondence	Read and respond to email from opposing counsel, review document production	0:36	0.6
25-Apr-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ EF re: expert report	0:18	0.3
25-Apr-19	Richard Sawyer	Rosario (Richard)	Correspondence	Read and respond to email from expert	0:06	0.1
26-Apr-19	Richard Sawyer	Rosario (Richard)	Draft	Revise expert report	3:06	3.1
26-Apr-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ Richard	0:30	0.5
26-Apr-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ expert	0:30	0.5
26-Apr-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ Len re: dep prep	0:24	0.4

27-Apr-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ expert	0:24	0.4
28-Apr-19	Richard Sawyer	Rosario (Richard)	Review	Review Richard's dep for dep prep, notes	2:06	2.1
28-Apr-19	Richard Sawyer	Rosario (Richard)	Prep	Read and respond to email from expert, gather and send materials	0:24	0.4
29-Apr-19	Richard Sawyer	Rosario (Richard)	Review	Review Richard's dep for dep prep	3:06	3.1
29-Apr-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ Lymari Leon re: scheduling dep	0:06	0.1
29-Apr-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ opposing counsel re: deposition scheduling	0:12	0.2
29-Apr-19	Richard Sawyer	Rosario (Richard)	Review	Review docs for dep prep	0:48	0.8
29-Apr-19	Richard Sawyer	Rosario (Richard)	Correspondence	Email to experts	0:06	0.1
29-Apr-19	Richard Sawyer	Rosario (Richard)	Correspondence	Correspondence w/ witnesses re: deps	0:18	0.3
29-Apr-19	Richard Sawyer	Rosario (Richard)	Prep	Dep prep w/ Richard	1:06	1.1
29-Apr-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ Richard re: discovery	0:06	0.1
29-Apr-19	Richard Sawyer	Rosario (Richard)	Review	Review opposing counsel's motion	0:18	0.3
29-Apr-19	Richard Sawyer	Rosario (Richard)	Review	Review Silverman dep outline for prep	0:42	0.7
29-Apr-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ EF, NB re: discovery	0:18	0.3
29-Apr-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ AF re: discovery, dep prep	0:12	0.2
29-Apr-19	Richard Sawyer	Rosario (Richard)	Draft	Draft, revise, and file response to letter motion	2:42	2.7
30-Apr-19	Richard Sawyer	Rosario (Richard)	Review	Review documents following email from opposing counsel, review client's Facebook pages	1:18	1.3
30-Apr-19	Richard Sawyer	Rosario (Richard)	Draft	email	1:30	1.5
30-Apr-19	Richard Sawyer	Rosario (Richard)	Correspondence	counsel	0:36	0.6
30-Apr-19	Richard Sawyer	Rosario (Richard)	Correspondence	Read still another email from opposing counsel, review document production, and respond	0:18	0.3
30-Apr-19	Richard Sawyer	Rosario (Richard)	Correspondence	Respond to scheduling emails from opposing counsel	0:06	0.1
30-Apr-19	Richard Sawyer	Rosario (Richard)	Review	Review discovery	0:36	0.6
30-Apr-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ EF re: discovery email from opp counsel	0:24	0.4
30-Apr-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ client re: discovery issues	0:24	0.4
30-Apr-19	Richard Sawyer	Rosario (Richard)	Correspondence	Review discovery production, review case law, draft and revise email to opposing counsel	1:18	1.3
1-May-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ opposing counsel re discovery	0:18	0.3
1-May-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ EF and LK re: discovery	0:18	0.3
1-May-19	Richard Sawyer	Rosario (Richard)	Draft	Draft amended rog response	0:18	0.3
1-May-19	Richard Sawyer	Rosario (Richard)	Review	Review client's social media for discovery	1:00	1.0
1-May-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call to Joyce Hartsfield re: scheduling dep prep	0:06	0.1
1-May-19	Richard Sawyer	Rosario (Richard)	Correspondence	Correspondence w/ opposing counsel	0:06	0.1

1-May-19	Richard Sawyer	Rosario (Richard)	Correspondence	Correspondence w/ expert	0:06	0.1
1-May-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ co-counsel re: case, investigation	0:24	0.4
1-May-19	Richard Sawyer	Rosario (Richard)	Draft	Revise expert report	0:36	0.6
1-May-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ EF, AF re: discovery	0:18	0.3
1-May-19	Richard Sawyer	Rosario (Richard)	Review	Review discovery for production, draft supplemental discovery request, send to Ds.	0:36	0.6
2-May-19	Richard Sawyer	Rosario (Richard)	Deposition	Richard's dep + prep	8:30	8.5
3-May-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ Joyce Hartsfield re: deposition	0:48	0.8
3-May-19	Richard Sawyer	Rosario (Richard)	Prep	Prep for meeting w/ Joyce Hartsfield	1:00	1.0
3-May-19	Richard Sawyer	Rosario (Richard)	Draft	Revisions to expert report	2:42	2.7
3-May-19	Richard Sawyer	Rosario (Richard)	Research	Legal research re: privilege	0:24	0.4
3-May-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ EF re: expert report	0:12	0.2
3-May-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ expert Agharkar and consulting expert	1:00	1.0
3-May-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ Ali re: updating discovery responses	1:18	1.3
5-May-19	Richard Sawyer	Rosario (Richard)	Correspondence	Read and respond to email from opposing counsel	0:06	0.1
5-May-19	Richard Sawyer	Rosario (Richard)	Draft	Revise expert report	0:12	0.2
5-May-19	Richard Sawyer	Rosario (Richard)	Correspondence	Read and respond to email from expert	0:06	0.1
6-May-19	Richard Sawyer	Rosario (Richard)	Deposition	Defend deposition of Joyce Hartsfield	2:18	2.3
6-May-19	Richard Sawyer	Rosario (Richard)	Meeting	Discuss Hartsfield dep w/ Emma	0:18	0.3
6-May-19	Richard Sawyer	Rosario (Richard)	Review	Read article written by expert	0:42	0.7
6-May-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ Steven Kaiser	0:12	0.2
6-May-19	Richard Sawyer	Rosario (Richard)	Review	Read expert report, comments	1:00	1.0
6-May-19	Richard Sawyer	Rosario (Richard)	Prep	Prep for Steven Kaiser dep	1:30	1.5
6-May-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ LK re: Silverman dep	0:18	0.3
6-May-19	Richard Sawyer	Rosario (Richard)	Review	Review consulting expert letter, compare to expert report	0:12	0.2
6-May-19	Richard Sawyer	Rosario (Richard)	Correspondence	Email to Richard re: discovery loose ends	0:12	0.2
7-May-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ NB re: Dysart expert report	0:06	0.1
7-May-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ EF, NB, AF re: expert report revisions	0:30	0.5
7-May-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ NB, Expert re: report	0:18	0.3
7-May-19	Richard Sawyer	Rosario (Richard)	Correspondence	Read and respond to opposing counsel's email, legal research	0:30	0.5
7-May-19	Richard Sawyer	Rosario (Richard)	Draft	Revise expert report	2:18	2.3
7-May-19	Richard Sawyer	Rosario (Richard)	Review	Review Dysart expert report	1:18	1.3
7-May-19	Richard Sawyer	Rosario (Richard)	Review	Review discovery productions	0:48	0.8
8-May-19	Richard Sawyer	Rosario (Richard)	Draft	Revise expert report	2:30	2.5
8-May-19	Richard Sawyer	Rosario (Richard)	Deposition	Defend Kaiser deposition	1:18	1.3



8-May-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ EF & NB re: expert report	0:48	0.8
8-May-19	Richard Sawyer	Rosario (Richard)	Draft	Revise Dysart expert report	4:18	4.3
8-May-19	Richard Sawyer	Rosario (Richard)	Draft	Edits to Agharkar report	0:12	0.2
8-May-19	Richard Sawyer	Rosario (Richard)	Review	Review discovery updates	0:24	0.4
9-May-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ witness	0:06	0.1
9-May-19	Richard Sawyer	Rosario (Richard)	Meeting	Talk w/ NB re: witness	0:12	0.2
9-May-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ expert Dysart re: report	0:12	0.2
9-May-19	Richard Sawyer	Rosario (Richard)	Draft	Revise expert report	0:48	0.8
9-May-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ ABH re: expert disclosure	0:18	0.3
9-May-19	Richard Sawyer	Rosario (Richard)	Phone Call	call w/ expert Shaffer	0:06	0.1
9-May-19	Richard Sawyer	Rosario (Richard)	Review	Review Shaffer report, legal research	0:30	0.5
9-May-19	Richard Sawyer	Rosario (Richard)	Review	Read opposing counsel's motion, legal research	0:24	0.4
10-May-19	Richard Sawyer	Rosario (Richard)	Draft	Draft response to Ds' discovery letter	2:00	2.0
10-May-19	Richard Sawyer	Rosario (Richard)	Correspondence	Email w/ experts re: Rule 26 material	0:06	0.1
10-May-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ AF re: assembling expert disclosures	0:06	0.1
10-May-19	Richard Sawyer	Rosario (Richard)	Review	Review expert material, revise expert report	0:12	0.2
10-May-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ AF re: discovery updates, dep prep	0:18	0.3
10-May-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ EF re: discovery letter	0:12	0.2
10-May-19	Richard Sawyer	Rosario (Richard)	Draft	Revise and file discovery letter	0:36	0.6
10-May-19	Richard Sawyer	Rosario (Richard)	Correspondence	Email to Chip re: discovery motion	0:06	0.1
10-May-19	Richard Sawyer	Rosario (Richard)	Review	Review and finalize supplemental disclosures and discovery response updates, email to D counsel re: discovery updates	0:48	0.8
10-May-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ NB, LK re: dep prep	0:30	0.5
11-May-19	Richard Sawyer	Rosario (Richard)	Correspondence	Email to opposing counsel	0:06	0.1
11-May-19	Richard Sawyer	Rosario (Richard)	Review	Phone call w/ Emma, review disclosures	0:18	0.3
14-May-19	Richard Sawyer	Rosario (Richard)	Correspondence	Email to investigator re: case	0:06	0.1
14-May-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ Russell re robbery case	0:12	0.2
14-May-19	Richard Sawyer	Rosario (Richard)	Meeting	Discuss robbery case w/ EF, AF, send email to team	0:24	0.4
14-May-19	Richard Sawyer	Rosario (Richard)	Correspondence	Read email from opposing counsel, review	0:18	0.3
14-May-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ Ali re: remaining discovery tasks	0:18	0.3
15-May-19	Richard Sawyer	Rosario (Richard)	Deposition	Deposition of Rebecca Freedman	2:00	2.0
15-May-19	Richard Sawyer	Rosario (Richard)	Prep	Dep prep for Lymari Leon dep	0:42	0.7
15-May-19	Richard Sawyer	Rosario (Richard)	Draft	finalize and send discovery responses	0:24	0.4
16-May-19	Richard Sawyer	Rosario (Richard)	Review	Listen to 13 alibis segments	0:30	0.5
16-May-19	Richard Sawyer	Rosario (Richard)	Prep	Assist NB w/ Guanica dep	0:06	0.1

16-May-19	Richard Sawyer	Rosario (Richard)	Research	Assist LK w/ Lymari dep prep	0:12	0.2
16-May-19	Richard Sawyer	Rosario (Richard)	Review	Review discovery responses	0:24	0.4
16-May-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ EF re: Ds' discovery emails, review EF's email	0:24	0.4
17-May-19	Richard Sawyer	Rosario (Richard)	Review	Watch Today show, listen to 13 alibis podcast	0:30	0.5
20-May-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ witness re: dep scheduling	0:06	0.1
20-May-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ EF, opposing counsel, meet EF	0:24	0.4
20-May-19	Richard Sawyer	Rosario (Richard)	Correspondence	Email to opposing counsel	0:06	0.1
20-May-19	Richard Sawyer	Rosario (Richard)	Review	Review docs for contention interrogatory response	1:42	1.7
20-May-19	Richard Sawyer	Rosario (Richard)	Draft	Draft letter motion re: out-of-time deposition	0:42	0.7
20-May-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ NB, EF, LK re: discovery responses	0:30	0.5
21-May-19	Richard Sawyer	Rosario (Richard)	Review	Review discovery production, responses for rog response	3:06	3.1
21-May-19	Richard Sawyer	Rosario (Richard)	Draft	Draft rog response	2:30	2.5
21-May-19	Richard Sawyer	Rosario (Richard)	Correspondence	Email re: discovery	0:06	0.1
22-May-19	Richard Sawyer	Rosario (Richard)	Draft	Draft rog response	3:30	3.5
22-May-19	Richard Sawyer	Rosario (Richard)	Review	Review discovery production for completeness, review privilege logs	0:36	0.6
22-May-19	Richard Sawyer	Rosario (Richard)	Review	Review and propose revisions to letter to the Court regarding depositions	0:36	0.6
22-May-19	Richard Sawyer	Rosario (Richard)	Draft	Revise and send Rog responses	2:12	2.2
22-May-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ EF, NB, LK re: rog responses	0:42	0.7
22-May-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ EF re: letter to court	0:12	0.2
22-May-19	Richard Sawyer	Rosario (Richard)	Draft	Draft letter to court re: defendants' letter	0:30	0.5
23-May-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ NB re: Alex Gonzalez dep prep	0:18	0.3
23-May-19	Richard Sawyer	Rosario (Richard)	Draft	Revise request to admit responses, send to opposing counsel	0:30	0.5
23-May-19	Richard Sawyer	Rosario (Richard)	Research	Legal research re: request to admit	0:48	0.8
23-May-19	Richard Sawyer	Rosario (Richard)	Prep	Dep prep Alex Gonzalez dep	3:18	3.3
24-May-19	Richard Sawyer	Rosario (Richard)	Prep	Alex Gonzalez dep prep	3:12	3.2
28-May-19	Richard Sawyer	Rosario (Richard)	Correspondence	Correspondence w/ investigator	0:12	0.2
28-May-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ opposing counsel	0:06	0.1
28-May-19	Richard Sawyer	Rosario (Richard)	Prep	Dep prep--Alex Gonzalez	4:06	4.1
29-May-19	Richard Sawyer	Rosario (Richard)	Meeting	meet w/ NB re: dep prep--Alex Gonzalez	0:12	0.2
29-May-19	Richard Sawyer	Rosario (Richard)	Prep	Dep prep for alex gonzalez	1:54	1.9
30-May-19	Richard Sawyer	Rosario (Richard)	Review	Review Guanica dep, notes for Alex dep	2:06	2.1
30-May-19	Richard Sawyer	Rosario (Richard)	Deposition	Appear for Alex dep, call Alex & reschedule	0:30	0.5
31-May-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call to opposing counsel re: discovery	0:06	0.1

31-May-19	Richard Sawyer	Rosario (Richard)	Review	Review deposition transcript	0:54	0.9
3-Jun-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call re: robbery	0:06	0.1
3-Jun-19	Richard Sawyer	Rosario (Richard)	Deposition	Deposition of Alex Gonzalez	4:06	4.1
3-Jun-19	Richard Sawyer	Rosario (Richard)	Prep	Dep prep for Alex Gonzalez	0:24	0.4
4-Jun-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ Richard re: case developments	0:24	0.4
5-Jun-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ Chip, NB, LK re: robbery, legal research	0:48	0.8
7-Jun-19	Richard Sawyer	Rosario (Richard)	Review	Review Richard's dep transcript	1:24	1.4
10-Jun-19	Richard Sawyer	Rosario (Richard)	Review	Review errata w/ AF	0:12	0.2
10-Jun-19	Richard Sawyer	Rosario (Richard)	Draft	Draft robbery motion	1:18	1.3
11-Jun-19	Richard Sawyer	Rosario (Richard)	Miscellaneous	Deal with getting records release to opp counsel, respond to emails re records release	0:24	0.4
11-Jun-19	Richard Sawyer	Rosario (Richard)	Review	Draft robbery motion	1:42	1.7
11-Jun-19	Richard Sawyer	Rosario (Richard)	Review	Read Ds' discovery motion, discuss w/ EF, NB	0:48	0.8
12-Jun-19	Richard Sawyer	Rosario (Richard)	Draft	Draft response to discovery letter	2:36	2.6
13-Jun-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ NB, follow-up conversation w/ LK	0:12	0.2
13-Jun-19	Richard Sawyer	Rosario (Richard)	Review	Review transcript from Gonzalez dep	0:24	0.4
13-Jun-19	Richard Sawyer	Rosario (Richard)	Draft	Revise robbery motion	4:12	4.2
13-Jun-19	Richard Sawyer	Rosario (Richard)	Correspondence	Email w/ opposing counsel	0:36	0.6
14-Jun-19	Richard Sawyer	Rosario (Richard)	Research	Legal research re: expert discovery	0:12	0.2
14-Jun-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ Sue DiMora (Chip's secretary) re: voicemail	0:06	0.1
14-Jun-19	Richard Sawyer	Rosario (Richard)	Correspondence	Email to opposing counsel	0:12	0.2
17-Jun-19	Richard Sawyer	Rosario (Richard)	Draft	Draft response to expert extension letter	0:36	0.6
19-Jun-19	Richard Sawyer	Rosario (Richard)	Draft	Draft letter re: expert extension	1:36	1.6
19-Jun-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ Richard	0:18	0.3
20-Jun-19	Richard Sawyer	Rosario (Richard)	Review	Review McDonough SCOTUS decision	0:36	0.6
20-Jun-19	Richard Sawyer	Rosario (Richard)	Draft	Draft supplemental authority letter	1:30	1.5
22-Jun-19	Richard Sawyer	Rosario (Richard)	Draft	Revise robbery motion	0:24	0.4
26-Jun-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ EF, AF & Chip re: case	0:54	0.9
26-Jun-19	Richard Sawyer	Rosario (Richard)	Draft	Revisions to robbery motion	1:12	1.2
2-Jul-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ opposing counsel re: discovery	0:06	0.1
2-Jul-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ Richard re: discovery	0:06	0.1
2-Jul-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ AF re: discovery production	0:06	0.1
2-Jul-19	Richard Sawyer	Rosario (Richard)	Draft	Draft and file joint status letter	0:18	0.3
8-Jul-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ NB, LK, Chip re: 440 motion	0:24	0.4



9-Jul-19	Richard Sawyer	Rosario (Richard)	Draft	Legal research & draft response to opposing counsel's IME email	0:42	0.7
9-Jul-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call to Chip re: 440	0:12	0.2
9-Jul-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ expert	0:12	0.2
9-Jul-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ EF & NB re: Ds' proposed IME	0:12	0.2
9-Jul-19	Richard Sawyer	Rosario (Richard)	Correspondence	IME	0:18	0.3
9-Jul-19	Richard Sawyer	Rosario (Richard)	Research	Legal research on 440 issue	2:18	2.3
10-Jul-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ opposing counsel re: IME	0:12	0.2
11-Jul-19	Richard Sawyer	Rosario (Richard)	Correspondence	Read email from opposing counsel, follow-up phone call & email to experts	0:18	0.3
12-Jul-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ neuropsych expert, email to opposing counsel	0:12	0.2
15-Jul-19	Richard Sawyer	Rosario (Richard)	Correspondence	Email to opposing counsel re: expert discovery	0:06	0.1
15-Jul-19	Richard Sawyer	Rosario (Richard)	Correspondence	Additional email correspondence w/ opposing counsel re: expert disclosures	0:06	0.1
16-Jul-19	Richard Sawyer	Rosario (Richard)	Review	Review Ds' discovery letter, discuss w/ EF	0:18	0.3
17-Jul-19	Richard Sawyer	Rosario (Richard)	Draft	Draft and file response to Ds' discovery letter	3:06	3.1
18-Jul-19	Richard Sawyer	Rosario (Richard)	Review	Review Ds' reply re IME	0:06	0.1
18-Jul-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ Chip re: 440	0:30	0.5
18-Jul-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ RR re: IME	0:24	0.4
18-Jul-19	Richard Sawyer	Rosario (Richard)	Correspondence	Emails w/ Richard.	0:12	0.2
22-Jul-19	Richard Sawyer	Rosario (Richard)	Meeting	meeting with EF, NB to discuss Richard instagram issues	0:18	0.3
24-Jul-19	Richard Sawyer	Rosario (Richard)	Draft	Meet w/ EF re: RR social media, draft memo	1:36	1.6
29-Jul-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ RR re: IME	0:30	0.5
31-Jul-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call to RR re: IME	0:06	0.1
2-Aug-19	Richard Sawyer	Rosario (Richard)	Phone Call	Assign digesting to intern	0:36	0.6
5-Aug-19	Richard Sawyer	Rosario (Richard)	Draft	Revisions to 440 motion, email to team	0:48	0.8
5-Aug-19	Richard Sawyer	Rosario (Richard)	Draft	Revisions to 440 motion	1:12	1.2
5-Aug-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ Richard	0:18	0.3
8-Aug-19	Richard Sawyer	Rosario (Richard)	Draft	Revisions to 440 motion	1:06	1.1
8-Aug-19	Richard Sawyer	Rosario (Richard)	Research	Legal research re: sealing of deps	0:24	0.4
9-Aug-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ Richard	0:12	0.2
12-Aug-19	Richard Sawyer	Rosario (Richard)	Review	Review discovery production, oversee production	0:24	0.4

13-Aug-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ Chip, NB	0:18	0.3
13-Aug-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ Chip	0:12	0.2
14-Aug-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call to Brachah re: possible reopening of expert discovery	0:06	0.1
15-Aug-19	Richard Sawyer	Rosario (Richard)	Correspondence	Email to Mark and Russell re: 440 motion	0:12	0.2
20-Aug-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ chip re 440	0:12	0.2
23-Aug-19	Richard Sawyer	Rosario (Richard)	Review	Review Defendants' expert report.	0:42	0.7
28-Aug-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ extern re: digesting	0:24	0.4
29-Aug-19	Richard Sawyer	Rosario (Richard)	Review	Review Ds' expert reports	0:24	0.4
29-Aug-19	Richard Sawyer	Rosario (Richard)	Review	Review Ds' letter to Court	0:06	0.1
30-Aug-19	Richard Sawyer	Rosario (Richard)	Correspondence	Emails w/ experts re rebuttal reports	0:12	0.2
30-Aug-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ Shaffer re: d rebuttal reports	0:18	0.3
30-Aug-19	Richard Sawyer	Rosario (Richard)	Correspondence	Email w/ opposing counsel re: adjournment	0:06	0.1
1-Sep-19	Richard Sawyer	Rosario (Richard)	Review	Review letter motion from opposing counsel	0:06	0.1
3-Sep-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ NB, EF re: experts, discovery	0:18	0.3
3-Sep-19	Richard Sawyer	Rosario (Richard)	Correspondence	Email to opposing counsel re: expert deps	0:06	0.1
4-Sep-19	Richard Sawyer	Rosario (Richard)	Research	Legal research re expert deps	0:30	0.5
4-Sep-19	Richard Sawyer	Rosario (Richard)	Correspondence	Email w/ NB & EF re: deps	0:06	0.1
4-Sep-19	Richard Sawyer	Rosario (Richard)	Correspondence	Email to experts re: dep availability	0:06	0.1
4-Sep-19	Richard Sawyer	Rosario (Richard)	Correspondence	Email to opposing counsel	0:06	0.1
6-Sep-19	Richard Sawyer	Rosario (Richard)	Review	Review expert reports, prep for expert deps	2:12	2.2
6-Sep-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ expert Shaffer w/ NB, ABH, LK, AF, post-call discussion	0:48	0.8
6-Sep-19	Richard Sawyer	Rosario (Richard)	Review	Review documents cited in defendants' expert reports	0:18	0.3
6-Sep-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ expert Dysart, NB, EF, LK	0:48	0.8
6-Sep-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ opposing counsel re: expert depositions	0:18	0.3
6-Sep-19	Richard Sawyer	Rosario (Richard)	Correspondence	Legal research, email to opposing counsel re: expert deps	0:48	0.8
9-Sep-19	Richard Sawyer	Rosario (Richard)	Review	Review draft expert rebuttal	0:12	0.2
9-Sep-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ EF & NB re: expert deps	0:12	0.2
9-Sep-19	Richard Sawyer	Rosario (Richard)	Correspondence	Read and respond to opposing counsel's email re: experts	0:30	0.5
9-Sep-19	Richard Sawyer	Rosario (Richard)	Review	Review research memo from intern, request follow up	0:24	0.4
9-Sep-19	Richard Sawyer	Rosario (Richard)	Correspondence	Read and respond to email from Richard	0:12	0.2
9-Sep-19	Richard Sawyer	Rosario (Richard)	Correspondence	Read and respond to additional email from opposing counsel, legal research	0:24	0.4
9-Sep-19	Richard Sawyer	Rosario (Richard)	Prep	Prep for expert deps, discussion w/ Len	0:36	0.6

10-Sep-19	Richard Sawyer	Rosario (Richard)	Meeting	Discuss expert report assignment w/ intern OO	0:18	0.3
10-Sep-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ NB, LK, and intern OO to discuss expert deps	0:48	0.8
10-Sep-19	Richard Sawyer	Rosario (Richard)	Draft	Draft letter to court re discovery	1:24	1.4
11-Sep-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ intern Z to discuss expert discovery assignment	0:12	0.2
11-Sep-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ EF, NB re discovery letter	0:24	0.4
11-Sep-19	Richard Sawyer	Rosario (Richard)	Draft	Revise discovery letter & file	4:42	4.7
11-Sep-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ opposing counsel	0:06	0.1
11-Sep-19	Richard Sawyer	Rosario (Richard)	Correspondence	Email to opposing counsel re: expert discovery	0:06	0.1
14-Sep-19	Richard Sawyer	Rosario (Richard)	Draft	Draft discovery letter to Court	2:06	2.1
15-Sep-19	Richard Sawyer	Rosario (Richard)	Draft	Revise and file discovery letter to Court	0:24	0.4
16-Sep-19	Richard Sawyer	Rosario (Richard)	Review	Review court's orders, talk to EF & NB, email to opposing counsel	0:12	0.2
16-Sep-19	Richard Sawyer	Rosario (Richard)	Prep	Prep for expert dep	2:42	2.7
16-Sep-19	Richard Sawyer	Rosario (Richard)	Phone Call	Call to expert	0:06	0.1
17-Sep-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ NB re: expert dep	0:12	0.2
17-Sep-19	Richard Sawyer	Rosario (Richard)	Correspondence	Email w/ opposing counsel re: expert deps	0:12	0.2
17-Sep-19	Richard Sawyer	Rosario (Richard)	Review	Review court order denying motion to dismiss	0:24	0.4
18-Sep-19	Richard Sawyer	Rosario (Richard)	Correspondence	Email w/ opposing counsel	0:12	0.2
18-Sep-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ NB, LK re: experts	0:24	0.4
18-Sep-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ LK, NB re: discovery	0:24	0.4
18-Sep-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ expert Shaffer	0:24	0.4
18-Sep-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ opposing counsel	0:12	0.2
18-Sep-19	Richard Sawyer	Rosario (Richard)	Prep	Prep for expert deps	1:06	1.1
19-Sep-19	Richard Sawyer	Rosario (Richard)	Review	Review court order re expert dep	0:06	0.1
20-Sep-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ opposing counsel re dep scheduling.	0:12	0.2
20-Sep-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ expert Dysart re: rebuttal report	0:12	0.2
20-Sep-19	Richard Sawyer	Rosario (Richard)	Review	Review Defendants' expert discovery production, email w/ defense counsel, legal research	1:06	1.1
20-Sep-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ NB, LK	0:06	0.1
20-Sep-19	Richard Sawyer	Rosario (Richard)	Prep	Expert dep prep	4:06	4.1
20-Sep-19	Richard Sawyer	Rosario (Richard)	Review	Review expert Shaffer's rebuttal opinion	0:30	0.5
20-Sep-19	Richard Sawyer	Rosario (Richard)	Review	Review Defendants' expert reports	0:24	0.4
20-Sep-19	Richard Sawyer	Rosario (Richard)	Correspondence	Email to expert Shaffer, review defendants' disclosure	0:12	0.2
20-Sep-19	Richard Sawyer	Rosario (Richard)	Review	Review chip motion	0:30	0.5
21-Sep-19	Richard Sawyer	Rosario (Richard)	Prep	Prep for expert dep	2:06	2.1

22-Sep-19	Richard Sawyer	Rosario (Richard)	Prep	Prep for expert dep	1:12	1.2
22-Sep-19	Richard Sawyer	Rosario (Richard)	Review	Review rebuttal report from Dysart	0:24	0.4
23-Sep-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ NB, AF re: expert dep	0:18	0.3
23-Sep-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ AF re: expert dep	0:12	0.2
23-Sep-19	Richard Sawyer	Rosario (Richard)	Meeting	Doc org to Ali for dep prep	0:06	0.1
23-Sep-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ expert Dysart, NB, and LK, follow-up convo w/ NB & LK	0:36	0.6
23-Sep-19	Richard Sawyer	Rosario (Richard)	Correspondence	Correspondence w/ opposing counsel	0:12	0.2
23-Sep-19	Richard Sawyer	Rosario (Richard)	Prep	Prep for expert dep	1:18	1.3
24-Sep-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ NB re: expert rebuttal report	0:12	0.2
24-Sep-19	Richard Sawyer	Rosario (Richard)	Draft	Review Ds' expert report, revise rebuttal report	6:12	6.2
25-Sep-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ NB re: expert dep	0:42	0.7
25-Sep-19	Richard Sawyer	Rosario (Richard)	Review	Assemble communications w/ experts for disclosure	0:54	0.9
25-Sep-19	Richard Sawyer	Rosario (Richard)	Review	Review Z's research and further assignment re: unsealing	1:06	1.1
25-Sep-19	Richard Sawyer	Rosario (Richard)	Prep	Prep for expert dep	4:12	4.2
25-Sep-19	Richard Sawyer	Rosario (Richard)	Review	Review communications on nextpoint, redact privilege	0:18	0.3
26-Sep-19	Richard Sawyer	Rosario (Richard)	Correspondence	Email w/ opposing counsel	0:06	0.1
26-Sep-19	Richard Sawyer	Rosario (Richard)	Deposition	Deposition of Laura Mickes	8:30	8.5
26-Sep-19	Richard Sawyer	Rosario (Richard)	Review	Review and produce communications w/ experts to opposing counsel	0:42	0.7
30-Sep-19	Richard Sawyer	Rosario (Richard)	Administrative	Assign task to intern, send docs.	0:12	0.2
30-Sep-19	Richard Sawyer	Rosario (Richard)	Correspondence	Email to expert Shaffer re: d disclosures	0:06	0.1
30-Sep-19	Richard Sawyer	Rosario (Richard)	Review	Review Mickes dep	0:18	0.3
1-Oct-19	Richard Sawyer	Rosario (Richard)	Review	Review Mickes transcript, revisions to Dysart rebuttal	3:36	3.6
3-Oct-19	Richard Sawyer	Rosario (Richard)	Draft	Revisions to Dysart rebuttal report.	1:12	1.2
3-Oct-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ Dysart, NB	0:18	0.3
4-Oct-19	Richard Sawyer	Rosario (Richard)	Deposition	Parker dep	4:00	4.0
4-Oct-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ Richard	0:18	0.3
4-Oct-19	Richard Sawyer	Rosario (Richard)	Review	Review draft discovery letter from intern	0:06	0.1
7-Oct-19	Richard Sawyer	Rosario (Richard)	Correspondence	Email from opposing counsel, draft email to expert Shaffer	0:06	0.1
7-Oct-19	Richard Sawyer	Rosario (Richard)	Draft	Revise letter to court re: protective order	1:42	1.7
7-Oct-19	Richard Sawyer	Rosario (Richard)	Draft	Revise and file letter re: expert dep	0:18	0.3
8-Oct-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ intern Z re: discovery letter draft	0:12	0.2
8-Oct-19	Richard Sawyer	Rosario (Richard)	Draft	Revisions to discovery letter	0:18	0.3
8-Oct-19	Richard Sawyer	Rosario (Richard)	Draft	Review and revise rebuttal report by Dysart.	0:48	0.8

9-Oct-19	Richard Sawyer	Rosario (Richard)	Correspondence	Email to expert shaffer	0:06	0.1
9-Oct-19	Richard Sawyer	Rosario (Richard)	Review	Review Shaffer rebuttal report	1:12	1.2
9-Oct-19	Richard Sawyer	Rosario (Richard)	Draft	Review and revise Agharkar's rebuttal report	1:36	1.6
9-Oct-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call to hernia doc	0:24	0.4
9-Oct-19	Richard Sawyer	Rosario (Richard)	Correspondence	Email w/ Nick re: doc	0:18	0.3
10-Oct-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ EF & LK re: expert	0:12	0.2
10-Oct-19	Richard Sawyer	Rosario (Richard)	Correspondence	Email to expert	0:06	0.1
14-Oct-19	Richard Sawyer	Rosario (Richard)	Correspondence	Email to client	0:18	0.3
14-Oct-19	Richard Sawyer	Rosario (Richard)	Draft	Revise and file letter re: Sanchez dep	0:24	0.4
15-Oct-19	Richard Sawyer	Rosario (Richard)	Review	Discuss w/ LK and EF disclosure of expert discovery	0:12	0.2
15-Oct-19	Richard Sawyer	Rosario (Richard)	Review	Review, prep, and disclose expert discovery	0:12	0.2
15-Oct-19	Richard Sawyer	Rosario (Richard)	Draft	Revisions to expert rebuttal reports	2:12	2.2
15-Oct-19	Richard Sawyer	Rosario (Richard)	Review	Review Dysart reports for dep prep	0:18	0.3
16-Oct-19	Richard Sawyer	Rosario (Richard)	Meeting	Dep prep meeting with Nick and Avi	0:30	0.5
16-Oct-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ Richard re unsealing order.	0:24	0.4
16-Oct-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ LK re: Fayer prep	0:12	0.2
16-Oct-19	Richard Sawyer	Rosario (Richard)	Draft	Revisions to expert reports, email experts	0:18	0.3
16-Oct-19	Richard Sawyer	Rosario (Richard)	Prep	Prep Dysart for dep	0:48	0.8
16-Oct-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ EF to discuss Dysart dep	0:06	0.1
16-Oct-19	Richard Sawyer	Rosario (Richard)	Review	Review LK edits to letter to opposing counsel	0:12	0.2
17-Oct-19	Richard Sawyer	Rosario (Richard)	Prep	Prep for Dysart dep	1:00	1.0
17-Oct-19	Richard Sawyer	Rosario (Richard)	Deposition	Dysart dep	4:00	4.0
17-Oct-19	Richard Sawyer	Rosario (Richard)	Review	Review len's outline for Fayer dep, discuss w/ Len	0:18	0.3
17-Oct-19	Richard Sawyer	Rosario (Richard)	Review	Review Shaffer edits to rebuttal report	0:12	0.2
23-Oct-19	Richard Sawyer	Rosario (Richard)	Research	Legal research re: expert fee	0:12	0.2
28-Oct-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ opposing counsel re: expert dep	0:06	0.1
28-Oct-19	Richard Sawyer	Rosario (Richard)	Correspondence	Case law research and email to opposing counsel	0:30	0.5
29-Oct-19	Richard Sawyer	Rosario (Richard)	Review	Read Ds' pre-motion letter	0:24	0.4
30-Oct-19	Richard Sawyer	Rosario (Richard)	Review	Review SJ letter for response	1:18	1.3
30-Oct-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ Dysart re: expert affidavit	0:18	0.3
30-Oct-19	Richard Sawyer	Rosario (Richard)	Correspondence	Email to Nick/Emma re: daubert affidavit	0:06	0.1
30-Oct-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ EF, ABH re: SJ letter	0:18	0.3
31-Oct-19	Richard Sawyer	Rosario (Richard)	Research	Legal research re: SJ letter	1:42	1.7
1-Nov-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ extern elena to assign digesting	0:18	0.3
1-Nov-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w extern Micaela re: digesting assignment	0:18	0.3



1-Nov-19	Richard Sawyer	Rosario (Richard)	Review	Review Fayer dep	1:06	1.1
1-Nov-19	Richard Sawyer	Rosario (Richard)	Draft	Legal research and draft SJ letter	5:36	5.6
2-Nov-19	Richard Sawyer	Rosario (Richard)	Draft	Draft response to SJ letter	7:48	7.8
3-Nov-19	Richard Sawyer	Rosario (Richard)	Draft	Revisions to pre-SJ letter	2:06	2.1
4-Nov-19	Richard Sawyer	Rosario (Richard)	Review	Review extern Elena's digest, give feedback	0:12	0.2
4-Nov-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ EF, ABH re: SJ letter	0:24	0.4
4-Nov-19	Richard Sawyer	Rosario (Richard)	Draft	Revise pre-SJ letter	8:06	8.1
5-Nov-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ NB & EF re: SJ letter	0:12	0.2
5-Nov-19	Richard Sawyer	Rosario (Richard)	Draft	Revise and file SJ opp letter	4:36	4.6
7-Nov-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ opposing counsel	0:06	0.1
7-Nov-19	Richard Sawyer	Rosario (Richard)	Correspondence	Review and revise letter to court re: SJ schedule	0:24	0.4
7-Nov-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ EF & BR re: Rosario SJ	0:24	0.4
12-Nov-19	Richard Sawyer	Rosario (Richard)	Court appearance	Pre-Sj motion hearing	0:48	0.8
13-Nov-19	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ client re: hearing	0:18	0.3
4-Dec-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ EF, ABH, BR, AS, AF re: MSJ strategy	0:48	0.8
4-Dec-19	Richard Sawyer	Rosario (Richard)	Research	SJ research	0:18	0.3
18-Dec-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ NB, EF, ABH, AS, AF re: summary jgmt response	1:00	1.0
19-Dec-19	Richard Sawyer	Rosario (Richard)	Review	Review digest of Mickes, notes	1:00	1.0
20-Dec-19	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ NB, ABH, AS re: SJ response	2:18	2.3
31-Dec-19	Richard Sawyer	Rosario (Richard)	Digest	Digest Cruger dep for SJ motion	5:30	5.5
31-Dec-19	Richard Sawyer	Rosario (Richard)	Review	Review docs for SJ motion	0:24	0.4
7-Jan-20	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ Avi re: 56.1 statement	1:00	1.0
10-Jan-20	Richard Sawyer	Rosario (Richard)	Review	Review summary judgment motion	0:48	0.8
10-Jan-20	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ AV, AF re: SJ motion	0:42	0.7
10-Jan-20	Richard Sawyer	Rosario (Richard)	Review	Review SJ motion	1:36	1.6
11-Jan-20	Richard Sawyer	Rosario (Richard)	Review	Review Draft 56.1 statement, legal research re: MSJ	2:18	2.3
13-Jan-20	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ Donna Lee Jones, meet w/ AF, AS	0:18	0.3
13-Jan-20	Richard Sawyer	Rosario (Richard)	Correspondence	Email to Richard	0:06	0.1
13-Jan-20	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ NB, ABH, EF, AS, AF, BR re: MSJ response	0:54	0.9
13-Jan-20	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ NB re: R 56.1 statement	0:06	0.1
13-Jan-20	Richard Sawyer	Rosario (Richard)	Review	Review docs for SJ motion	1:24	1.4
				Review draft R 56.1 statement		
13-Jan-20	Richard Sawyer	Rosario (Richard)	Review		1:24	1.4
14-Jan-20	Richard Sawyer	Rosario (Richard)	Review	Doc review for MSJ opp	2:36	2.6
14-Jan-20	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ AS re: Rule 56.1 statement	1:12	1.2

16-Jan-20	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ AS, AF re: MSJ	0:12	0.2
16-Jan-20	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ NB, EF, ABH, AS, AF re: MSJ	1:00	1.0
16-Jan-20	Richard Sawyer	Rosario (Richard)	Review	Doc review for MSJ opp	1:30	1.5
16-Jan-20	Richard Sawyer	Rosario (Richard)	Review	Review draft R 56.1 statement, comments and edits	1:06	1.1
17-Jan-20	Richard Sawyer	Rosario (Richard)	Draft	Draft response to Ds' R 56.1 statement	3:24	3.4
18-Jan-20	Richard Sawyer	Rosario (Richard)	Draft	Draft response to Ds' R 56.1	4:54	4.9
19-Jan-20	Richard Sawyer	Rosario (Richard)	Draft	Draft response to Ds' 56.1 statement	5:36	5.6
20-Jan-20	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ client	0:30	0.5
20-Jan-20	Richard Sawyer	Rosario (Richard)	Review	Review investigator notes	0:06	0.1
20-Jan-20	Richard Sawyer	Rosario (Richard)	Correspondence	Email to NB and co-counsel	0:12	0.2
20-Jan-20	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ co-counsel	0:18	0.3
20-Jan-20	Richard Sawyer	Rosario (Richard)	Draft	Draft response to Ds' R 56.1 statement	5:06	5.1
21-Jan-20	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ Ali to discuss MSJ opp assignment	0:06	0.1
21-Jan-20	Richard Sawyer	Rosario (Richard)	Draft	Edits to letter re: more pages	2:00	2.0
22-Jan-20	Richard Sawyer	Rosario (Richard)	Review	Review letter to court	0:12	0.2
23-Jan-20	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ AF re: MSJ opp assignment	0:06	0.1
23-Jan-20	Richard Sawyer	Rosario (Richard)	Review	Read opposing counsel's letter in response to motion for more pages, discuss w/ team	0:18	0.3
24-Jan-20	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ Rosario	0:06	0.1
24-Jan-20	Richard Sawyer	Rosario (Richard)	Meeting	Discuss motion to dismiss w/ EF	0:06	0.1
24-Jan-20	Richard Sawyer	Rosario (Richard)	Review	Review docs for MSJ opp	2:00	2.0
24-Jan-20	Richard Sawyer	Rosario (Richard)	Review	Review court order, correspondence w/ team	0:06	0.1
27-Jan-20	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ ABH , BR, AS, AF re: MSJ response	1:00	1.0
28-Jan-20	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ opposing counsel	0:06	0.1
30-Jan-20	Richard Sawyer	Rosario (Richard)	Draft	Review/revise responsive 56.1	3:48	3.8
2-Feb-20	Richard Sawyer	Rosario (Richard)	Draft	Revise response to R 56.1 statement	4:30	4.5
3-Feb-20	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ AS re: MSJ response	0:12	0.2
3-Feb-20	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ Avi re: R 56.1 statement	0:18	0.3
4-Feb-20	Richard Sawyer	Rosario (Richard)	Draft	Revise R 56.1 statement	1:00	1.0
4-Feb-20	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ ABH re: assignments	0:12	0.2
5-Feb-20	Richard Sawyer	Rosario (Richard)	Draft	Revise R 56.1 statement	7:48	7.8
6-Feb-20	Richard Sawyer	Rosario (Richard)	Draft	Revise R 56.1 statement	2:06	2.1
7-Feb-20	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ ABH, AS, AF, BR re: MSJ opp	0:48	0.8
7-Feb-20	Richard Sawyer	Rosario (Richard)	Draft	Revisions to R 56.1	5:30	5.5
8-Feb-20	Richard Sawyer	Rosario (Richard)	Draft	Revise R 56.1	6:36	6.6

9-Feb-20	Richard Sawyer	Rosario (Richard)	Draft	Revise R 56.1	8:00	8.0
10-Feb-20	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ NB, EF, ABH, AS, BR re: MSJ Opp	1:36	1.6
10-Feb-20	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ ABH re: MSJ opp	0:12	0.2
10-Feb-20	Richard Sawyer	Rosario (Richard)	Draft	Legal research and draft MSJ opp brief	5:12	5.2
11-Feb-20	Richard Sawyer	Rosario (Richard)	Draft	records	0:18	0.3
11-Feb-20	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ Richard	0:18	0.3
11-Feb-20	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ Ali re: assignment	0:06	0.1
11-Feb-20	Richard Sawyer	Rosario (Richard)	Draft	Draft SJ brief	11:12	11.2
12-Feb-20	Richard Sawyer	Rosario (Richard)	Draft	Draft SJ opp	10:36	10.6
13-Feb-20	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ ABH, AF, AS, BR re: SJ opp	0:36	0.6
13-Feb-20	Richard Sawyer	Rosario (Richard)	Draft	Draft SJ opp brief	12:36	12.6
14-Feb-20	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ ABH and BR re: MSJ opp	0:12	0.2
14-Feb-20	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ NB, ABH, EF, AS, AF re: brief	1:18	1.3
14-Feb-20	Richard Sawyer	Rosario (Richard)	Draft	Revisions to SJ brief	8:06	8.1
14-Feb-20	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ Richard	0:12	0.2
15-Feb-20	Richard Sawyer	Rosario (Richard)	Draft	Revise R 56.1 statement	9:24	9.4
16-Feb-20	Richard Sawyer	Rosario (Richard)	Draft	Revisions to R 56.1 statement	8:48	8.8
17-Feb-20	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ NB & ABH re: R. 56.1	0:24	0.4
17-Feb-20	Richard Sawyer	Rosario (Richard)	Draft	Revise R. 56.1, responsive R. 56.1	11:24	11.4
18-Feb-20	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ NB, EF, ABH re: responsive 56.1	1:48	1.8
18-Feb-20	Richard Sawyer	Rosario (Richard)	Meeting	Meet w/ ABH, EF, NB, YD, AS, AF, BR re: brief	1:42	1.7
18-Feb-20	Richard Sawyer	Rosario (Richard)	Draft	Revisions to 56.1 and responsive 56.1	7:12	7.2
19-Feb-20	Richard Sawyer	Rosario (Richard)	Draft	Revisions to responsive 56.1, affirmative 56.1	9:24	9.4
20-Feb-20	Richard Sawyer	Rosario (Richard)	Draft	Revise brief, r 56.1, responsive r 56.1	10:18	10.3
21-Feb-20	Richard Sawyer	Rosario (Richard)	Draft	Revise and finalize SJ opp	5:18	5.3
16-Mar-20	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call re: loans	0:30	0.5
8-Apr-20	Richard Sawyer	Rosario (Richard)	Review	Read defedants' SJ reply papers	1:24	1.4
9-Apr-20	Richard Sawyer	Rosario (Richard)	Review	Review Defendants' reply submissions	1:36	1.6
10-Apr-20	Richard Sawyer	Rosario (Richard)	Review	Review exhibits, reply	1:12	1.2
13-Apr-20	Richard Sawyer	Rosario (Richard)	Correspondence	Email w/ client	0:06	0.1
13-Apr-20	Richard Sawyer	Rosario (Richard)	Review	Review reply briefing, legal research	0:42	0.7
14-Apr-20	Richard Sawyer	Rosario (Richard)	Draft	Draft email to opposing counsel & related legal research	2:36	2.6
16-Apr-20	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ EF & ABH re: SJ reply	0:18	0.3



17-Apr-20	Richard Sawyer	Rosario (Richard)	Correspondence	Respond to email from opposing counsel	0:06	0.1
18-May-20	Richard Sawyer	Rosario (Richard)	Correspondence	Email to client	0:06	0.1
9-Jun-20	Richard Sawyer	Rosario (Richard)	Draft	Draft and file letter to Court	0:36	0.6
19-Jan-21	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ client	0:30	0.5
20-Jan-21	Richard Sawyer	Rosario (Richard)	Review	Review summary judgment decision, notes	1:06	1.1
20-Jan-21	Richard Sawyer	Rosario (Richard)	Phone Call	Phone call w/ client	0:42	0.7
22-Jan-21	Richard Sawyer	Rosario (Richard)	Meeting	meeting re daubert letter	0:42	0.7
23-Jan-21	Richard Sawyer	Rosario (Richard)	Research	Legal research re daubert	1:30	1.5
24-Jan-21	Richard Sawyer	Rosario (Richard)	Draft	Research and draft daubert letter	1:06	1.1
26-Jan-21	Richard Sawyer	Rosario (Richard)	Draft	Research and draft daubert letter	0:30	0.5
27-Jan-21	Richard Sawyer	Rosario (Richard)	Draft	Research and draft daubert letter	3:18	3.3

<b>Total</b>	<b>1250.3</b>
--------------	---------------

**TRAVEL HOURS**

<b>Date</b>	<b>Person</b>	<b>Client</b>	<b>Activity</b>	<b>Description</b>	<b>Duration</b>	<b>Time Totals</b>
6-Nov-18	Richard Sawyer	Rosario (Richard)	Travel	Travel from pre-motion conference	0:12	0.2
18-Dec-18	Richard Sawyer	Rosario (Richard)	Travel	office	0:30	0.5
21-Dec-18	Richard Sawyer	Rosario (Richard)	Travel	Travel to and from inspection of police file	2:30	2.5
10-Feb-19	Richard Sawyer	Rosario (Richard)	Travel	Travel to Palm Beach and to/from witnesses' home	6:06	6.1
13-Feb-19	Richard Sawyer	Rosario (Richard)	Travel	Return from West Palm Beach	5:06	5.1
2-Apr-19	Richard Sawyer	Rosario (Richard)	Travel	Travel to and from witness interview	1:48	1.8

<b>Total</b>	<b>16.2</b>
--------------	-------------